Submitted 5pm 26th May 2020

Full List of Consultation Questions

Background Information Questions

To enable UK Research and Innovation (UKRI) to effectively analyse responses from different stakeholder groups, respondents are requested to provide some background information about themselves. Questions marked with an asterisk (*) are mandatory. In the online response for some questions, including mandatory questions, will only appear for specific types of respondent.

I. **Please provide a named contact and email address so that UKRI can contact you regarding your responses.**
Sally Hardy sally.hardy@regionalstudies.org

II. **Please indicate if you are also happy for UKRI to contact you about the outcomes of the consultation.**
Yes

III. **Please indicate who you are responding on behalf of**.
    a.   Yourself as an individual
    b.   An organisation
    c.   Other (including part of an organisation, department, informal group) – please specify type

IV. **Please specify the name of your organisation.**
Regional Studies Association

V. **Please specify the name of your group/department.**

VI. **Please specify which country you, your organisation or your group are based in.**
United Kingdom

VII. **Which disciplinary area(s) would you associate you, your organisation or your group with? Please select all that apply.**
    a.   Arts and humanities
    b.   Medicine, health and life sciences
    c.   Physical sciences, engineering and mathematics
    d.   Social sciences
    e.   Interdisciplinary research
    f.   Not applicable

If you, your organisation or your group is responding on behalf of a specific discipline within an area indicated above, please describe it using a maximum of five key words separated by spaces

Geography, Economics, Political Studies, Planning

VIII. **What best describes the capacity in which you, your organisation or your group are responding?**
     a.   Researcher(s)
     b.   Publisher (including employees and representative bodies)
     c.   Learned society or academy with an in-house publishing arm (including employees)
     d.   Learned society or academy which outsources publishing to a third party (including employees)
     e.   Learned society or academy which does not publish (including employees)
     f.   Providers of scholarly communication infrastructure or services (including employees and representative bodies)
     g.   Library or research management (including departments, employees and representative bodies)
     h.   Higher education institute (HEI) (including departments, employees and representative bodies)
     i.   Business that conducts, uses or publishes research and/or innovation (including employees and representative bodies)
     j.   Research and/or innovation funder (including employees and representative bodies)
     k.   Member(s) of the public
     l.   Other research performing organisation (including departments, employees and representative bodies) - please specify:
     m.   Other user or producer of research outputs - please specify:
     n.   Other - please specify:

IX. **UKRI will share responses to this consultation (excluding personal data) with its sponsor department, the Department for Business, Energy and Industrial Strategy (BEIS), and other UK government departments and agencies, to explore OA issues. Have you or members of your group applied or been part of an application for grant funding from the following? If applicable, please select all that apply.**
     a.   UKRI (including AHRC, BBSRC, ESRC, EPSRC, Innovate UK, MRC, NERC, Research England, STFC, as well as predecessor bodies, HEFCE and RCUK)
     b.   UK Space Agency
     c.   Department for International Development (DFID) and subsidiary bodies
     d.   Department of Health and Social Care (DHSC) including National Institute for Health Research (NIHR) and other subsidiary bodies
     e.   Department for Environment, Food and Rural Affairs (DEFRA) and subsidiary bodies

If you or members of your group have applied or been part of an application for grant funding from other UK government departments or their subsidiary bodies, please specify the awarding body:

X.   **If responding on behalf of a company, please provide your Company Registration Number (if known):**

4116288

XI.   **If responding on behalf of a charity, please provide your Charity Registration Number (if known):**

1084165

XII.   **If responding on behalf of an organisation, please indicate your staff headcount (if known).**
   a.   ≥ 250 (large business)
   b.   < 250 (medium-sized business)
   c.   < 50 (small business)
   d.   < 10 (micro business)

XIII.   **If applicable, which researcher career stage(s) do you, your organisation or your group represent? Select all that apply.**
   a.   Postgraduate researcher
   b.   Post-doctoral researcher
   c.   Research leader (responsible for intellectual leadership and overall management of research projects)
   d.   Other (including retired researcher, citizen researcher) – please specify: retired, citizen researcher, independent researchers

Section A: Research Articles

Q1. **To what extent do you agree or disagree that it is clear what research articles are in-scope of UKRI's proposed OA policy (see paragraph 46 of the consultation document)?**
Strongly agree / Agree / Neither agree nor disagree / Disagree / Strongly disagree / Don't know / No opinion.
If anything is unclear, please explain why (1,350 characters maximum, approximately 200 words).

Q2. **Are there any additional considerations that the UK HE funding bodies should take into account when defining research articles that will be in - scope of the OA policy for the REF-after-REF 2021?**
Yes / No / Don't know / No opinion.
If yes, please expand (1,350 characters maximum, approximately 200 words).

Please see paragraphs 29-31 of the consultation document before answering this question.

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

Q4. **Are there any specific challenges for you, your community or your organisation in terms of complying with the requirement in UKRI's proposed policy for immediate OA of in-scope research articles?**
Yes / No / Don't know / No opinion.
Please explain and, where possible, evidence your answer. UKRI notes that there will be a period allowing for implementation before the policy comes into force (see paragraph 70 of the consultation document). (2,650 characters maximum, approximately 400 words.)

- If URKI open access policy can be fully funded the RSA will manage the transition.
- Green OA with a zero embargo and CC-BY licence will not work in the sector as it cannot function without a model to support its existence - subscriptions. Many social science societies can't act independently as we publish with commercial publishers. Zero embargo Green OA will not provide the income to support publishing standards of trust, reliability and confidence and there is a real concern that it will negatively impact on subscriptions which currently underpin journal publishing.
- It is improbable that societies can find a business model in post publishing curation.
- **We ask that UKRI develop a permissive policy. We suggest consideration be given to preprint servers for all UKRI funded content with deposit of author original articles to achieve full and immediate open access of UKRI funded research prior to editorial and publishing processes which might also result in an "open access double lock" of APC or transformative deal open access publication.**

- The extent of UKRI policy is critical to the health of the RSA. There is danger that the damage to the learned society sector will be incremental as each funder rolls out their policy. As funders move with restrictive policies a number of outcomes are likely – sector responses may become defensive, blocking and delaying effective shifts to the OA future that we all seek and some societies and small publishers will come to economic crisis and probable failure. The current crisis adds to the sector's pain as conference, membership and investment income are all post COVID challenged. It has become common for policy makers to question the contribution of societies and publishers. The contribution has now been dangerously understated and as the sector shrinks their loss will be keenly felt in the disciplinary communities to the detriment of all.
- The RSA book series will be imperilled by an embargo of less than 24 months. Most hardback sales come in the first 12 months but paperback and e-book sales follow this. With a short embargo we will not achieve current levels of hardback sales as hard-pressed librarians wait for open access copies to become available.
- **We ask for policy across UKRI Research Council funding and REF after REF2021 to support gold OA, transformative deals, inclusion of hybrid journals (where UKRI funded inputs are only part of the journal's content) to allow the society to continue to publish, disseminate and advocate on its communities' research at a reasonable level of income and with appropriate transparencies.**

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.

- To remove version confusion, the article should be deposited in a publisher repository (ideally a preprint server for immediate and full open access) and be linked in due course to the version of record.
- Publisher repositories/pre-print servers have digital preservation measure in place as standard and unnecessary expense and replication can be avoided

Q6. **For research articles, are there any additional considerations relating to OA routes, publication venues and embargo periods that the UK HE funding bodies should take into account when developing the OA policy for the REF-after-REF 2021?**
Yes / No / Don't know / No opinion.
If yes, please expand (2,000 characters maximum, approximately 300 words).

Please see paragraphs 29-31 of the consultation document before answering this question.

- The greater number of policies, both in the UK and globally that have strict mandates on open access without the funding to support gold, the higher the risk to

the learned society sector and the availability of high quality journals as venues for researchers' work.

- The Regional Studies Association stands by the value of each of its titles and defends the right of researchers to publish in their journal of choice, where their contribution best fits within disciplinary debates and where societies can undertake supportive marketing and advocacy.
- The dangers of extending UKRI Research Council policy to the REF after REF 2021 is three-fold. Firstly, the number of articles and monographs in AHSS covered by REF policy will be significantly higher than for Research Council funded outputs and so that policy will be relatively more impactful on the sector.
- Secondly it is highly unlikely that there will be sufficient funding in the AHSS to fund gold OA
- Thirdly insistence on zero embargo green may be refused by our commercial publishing partners for commercial reaons and would, if permitted, contribute to creating an environment where subscriptions and renewals would be vulnerable to cancellation with immediate and deleterious consequences for AHSS societies and their work whether policy facing or capacity building.
- The loss of societies and their expertise as the central nervous system of the research ecosystem, working independently, sending pulses for action would be sorely missed in the research community.
- We ask that UKRI colleagues think carefully about the movement towards OA and the cumulative effect that this will have on learned societies, societies with commercial partners, self-publishing societies and small publishers. Societies must be left room to operate financially and to perform their role in their communities – a role that cannot easily be replicated by any other bodies and which to reinvent may have significant costs.

Q7. **To what extent do you agree or disagree that where compliance with UKRI's OA policy is achieved via a repository, a CC BY licence (or Open Government Licence where needed) should be required for the deposited copy?**
Strongly agree / Agree / Neither Agree nor disagree / Disagree / Strongly disagree / Don't Know / No opinion.
Please explain your answer (1,350 characters maximum, approximately 200 words).

- Using the most permissive of the Creative Commons Licences opens the risks that work might be reused in inappropriate ways and that it might be commercially exploited.
- **We ask that UKRI consider a wider use of the ND licence – preferably applied at the level of research council for ease of compliance and that NC be permitted to allow societies and publishers to recoup the costs up to acceptance (AAM) such as peer review and other editorial inputs. Note that the introduction of a preprint server requirement for author submitted articles would avoid this issue.**

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).

- The RSA believes that in AHSS there should be an option to have ND. We would prefer this to be possible at the level of Research Councils for administrative ease. In social science you will be aware that there is concern about work being taken out of context and ND protects against this. The RSA publishes a journal that falls into political science and publishes material where this is important, hence our view.
- We note that ND is permitted for books and the principles are the same
- **We ask that UKRI adopt a more flexible approach in relation to the ND licence and streamline the path to its availability in AHSS. If this can't be done at research council level it could be done by grant, discipline etc we encourage researcher choice on this matter**

Q9. **Would the proposed licensing requirements for UKRI's OA policy, which exclude third-party content (see paragraph 55 of the consultation document), affect your or your organisation's ability to publish in-scope research articles containing third-party content?**
Yes / No / Don't know / No opinion.
If yes, please explain how (1,350 characters maximum, approximately 200 words).

Q10. **Are there other considerations UKRI should take into account regarding licensing requirements for research articles in-scope of its proposed OA policy?**
Yes / No / Don't know / No opinion.
If yes, please expand (1,350 characters maximum, approximately 200 words).

Q11. **For research articles, are there any additional considerations relating to licensing that the UK HE funding bodies should take into account when developing the OA policy for the REF-after-REF 2021?**
Yes / No / Don't know / No opinion.
If yes, please expand (2,000 characters maximum, approximately 300 words).

Please see paragraphs 29-31 of the consultation document before answering this question.

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).

Please note that views are not sought on whether institutions should hold the copyright to work produced by their employees as this is subject to Section 11 of the Copyright, Designs and Patents Act 1988 and institutional copyright policies.

- **We do not believe that this is an appropriate area for UKRI requirements as publishers do not need copyright to publish as they can use a licence. We ask that UKRI does not make requirements in this respect**

Q13. **Regarding research articles in-scope of UKRI's OA policy, to what extent do you agree or disagree with each of the seven proposed technical standard requirements for journals and OA publishing platforms?**

For each of the seven standards (see paragraphs 67a-67g of the consultation document): Strongly agree / Agree / Neither agree nor disagree / Disagree / Strongly disagree / Don't know / No opinion.

For each of the seven standards (see paragraphs 67a-67g of the consultation document), please explain your answer (700 characters maximum, approximately 100 words, per standard).

a. persistent digital object identifiers (PIDs) for research outputs must be implemented according to international standards such as DOI, URN or Handle

b. article-level metadata must be used according to a defined application profile that supports UKRI's proposed OA policy and is available via a CC0 public domain dedication; the metadata standard must adhere to international best practice such as the Crossref schema and OpenAIRE guidelines

c. machine-readable information on the OA status and the licence must be embedded in the article in a standard non-proprietary format

d. long-term preservation must be supported via a robust preservation programme such as CLOCKSS, Portico or an equivalent

e. openly accessible data on citations must be made available according to the standards set out by the Initiative for Open Citations (I4OC)

f. self-archiving policies must be registered in the SHERPA RoMEO database that underpins SHERPA/FACT

g. unique PIDs for research management information must be used and must include the use of ORCID to identify all authors and contributors

Q14. **Regarding research articles in-scope of UKRI's OA policy, to what extent do you agree or disagree with each of the five proposed technical standard requirements for institutional and subject repositories?**
For each of the five standards (see paragraphs 68a-68e of the consultation document):
Strongly agree / Agree / Neither agree nor disagree / Disagree / Strongly disagree / Don't know / No opinion.
For each of the five standards (see paragraphs 68a-68e of the consultation document), please explain your answer (700 characters maximum, approximately 100 words, per standard).

a. PIDs for research outputs must be implemented according to international standards such as DOI, URN or Handle

b. article-level metadata must be implemented according to a defined application profile that supports the proposed UKRI OA policy and is available via a CC0 public domain dedication; this should include the persistent identifier to both the author's accepted manuscript and the version of record; the metadata standard must adhere to international best practice such as the OpenAIRE guidelines

c. machine-readable information on the OA status and the licence must be embedded in the article in a standard non-proprietary format

d. unique PIDs for research management information must be used and must include the use of ORCID to identify all authors and contributors

e. the repository must be registered in the Directory of Open Access Repositories (OpenDOAR)

Q15. **To support the adoption of technical standards for OA, are there other standards, actions and/or issues UKRI should consider?**
Yes / No / Don't know / No opinion.
Please explain your answer (2,650 characters maximum, approximately 400 words).

- **We ask that UKRI consider that many societies, including the Regional Studies Association publish with commercial partners, and therefore cannot make a commitment to adhering to new standards without their agreement.**
- **We ask that the requirements are not so technical that they are impossible to comply with. cOAlition S's requirements were so stringent and "high-end" that David Sweeney himself, in a meeting with SocPC, said they'd gone too far and compliance was too difficult.**

Q16.   **To support the implementation of UKRI's proposed OA policy requirement for research articles to include an access statement for underlying research materials (see paragraph 69 of the consultation document), are there any technical standards or best practices that UKRI should consider requiring?**

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

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

- **We ask that UKRI consider initiatives to assist in the transparency and openness of underlying research materials but be as permissive as possible in the promotion of this transparency and be aware that not all publishers have equal ability to meet overly tight regulation in this area, for clarity it should not be mandatory. At the same time as a society we welcome increased transparency in relation to supporting researcher materials for the discipline.**

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).

- **We ask that UKRI consider delaying the requirements to comply with new policy in this area as societies are now trying to reinvent themselves in relation to the coronavirus pandemic which has turned our business models on their heads to the extent that all four legs of the Regional Studies Association income stool are now disrupted.**
- **We suggest that given the timing, applying the policy to articles accepted for publication on or after 1st January 2022 means that it will apply to some articles submitted as much as a year earlier. It might be possible to support the idea of alignment with the revised REF 2021 timing when known.**
- **We ask that UKRI consider using paper SUBMISSION date rather than when papers are agreed for publication to remove confusion in the system**

Q18.   **For research articles, are there any considerations that UKRI and UK HE funding bodies need to take into account regarding the interplay between the implementation dates for UKRI's OA policy and the OA policy for the REF-after-REF 2021?**

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

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

- We suggest that UKRI considers carefully the dates that are used. Article submission date may be best as the date accepted for publication may cause problems for journals a REF cycles come round.

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).

- There is a scalar effect in play here, but the effects are at all levels and relate to the danger of subscriptions cancellations if a zero embargo green policy is introduced.
- If the policy applies only to Research Council funded outputs that will have an impact as from experience with our gold OA journal, Regional Studies, Regional Science we know that many of our authors struggle to find money for article processing charges. This will mean that they opt for green OA rather than gold.
- If the policy is rolled out to include the REF after REF 2021 then the number of articles covered by the policy expands dramatically with a related impact to the Association.
- In the interest of taking key parts of the ecosystem forward it is worth noting that in a post COVID-19 world where conference and membership incomes will be adversely affected along with any investment incomes, taking caution with further shocks to the sector would pay dividends. Societies have fragile financial structures that will be challenging to change and this will take time.
- **We ask that UKRI, as said above, properly fund Open Access to guard against this combination of negative effects – subscription cancellations and reduced APCs – coming to pass.**

Q20. **Do you think the proposals outlined in Section A of the consultation document will result in financial benefits for you or your organisation?**
Yes / No / Don't Know / No opinion.
Please expand, providing evidence to support your view, where possible (2,000 characters maximum, approximately 300 words).

Q21. **Can you provide any evidence of a changing balance of costs across research organisations arising from an emphasis on publishing costs rather than read costs?**
Yes / No / Don't know / No opinion.
Please expand (2,000 characters maximum, approximately 300 words).

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

- It is highly likely, as discussed with Helen Bruce in February 2020 that as the policies for open access play out across territories that impact on our journals that our APCs will need to increase. This is certainly the case for our gold open access journal where the APC has been kept artificially low to promote the journal and the OA publishing form. The apcs for this journal are supported by our hybrid journals and do not meet the real costs of the journal. We suppose that this would be an unforeseen and unwanted consequence of policy changes and it points to the relative vulnerability of AHSS in these discussions
- **We ask UKRI to consider unwanted outcomes when considering their policy prescriptions**

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).

- **Potentially we agree that there could be more transparency in the system for publication price setting and we would be willing to work with our commercial publishers to this end but we do not have control in these discussion**
- We have welcomed the appearance of publisher policies on the management of "double dipping"

Q24. **Regarding UKRI's consideration about restricting the use of its OA funds for publication in hybrid journals (see paragraph 80 of the consultation document), please select the statement that best reflects your views:**
a. UKRI OA funds should not be permitted to support OA publication in hybrid journals
b. UKRI OA funds should only be permitted to support OA publication in hybrid journals where they are party to a transformative agreement or similar arrangement
c. UKRI Open Access funds should be permitted to support Open Access publication in hybrid journals
d. None of the above
e. Don't know
f. No opinion
Please explain and, where possible, evidence your answer (2,650 characters maximum, approximately 400 words).

- The RSA is unusual in the social sciences for having a gold open access journal – Regional Studies, Regional Science. This journal in spite of being heavily promoted and being the best in our field, remains financially unsustainable and is effectively subsidised by other journals in our portfolio which work to the hybrid model. RSRS has high usage but isn't sustainable – we need a shift to open access that addresses this market challenge
- We publish 4 additional journals which advance research in their fields through careful editorial curation, help to gain consensus on areas of discussion and debate, connect researchers across the global community and are trsuted and

valuable venues. These four (hybrid) journals offer a critical route to gold open access and in social science the importance of the journal as a brand remains. Authors invest significantly in the selection of journal for their work and this choice can add to the impact of their work and its uptake by other researchers and policy makers. Specifically, the journal adds value to the discipline/field through editorial actions such as calls for papers, the curation of special issues, building of debates and so on. This seems to have less resonance in STEM but remains fundamental to researcher publishing in AHSS and we ask that UKRI give appropriate weight to this in their thinking about the inclusion of hybrid journals. These journals would not work as OA journals now. Operating them as hybrid is the most effective and pragmatic option which also gives authors access to OA if they want that for their research outputs.

- If UKRI do not permit the inclusion of gold APC for hybrid journals affected researchers in our field would have very, very few options to publish
- It is worth noting that the amount of material available in open format is increasing – T&F report that half of the UK authored research they have published from 2016 – 2018 is already openly available through different channels including hybrid and pure OA
- We believe that researchers should be allowed considerable freedom to choose where to publish their work and we can see disadvantages to heavy governmental prescription over research publication and dissemination
- The development by the commercial publishers of transformative deals offers an encouraging way forward
- **We encourage a permissive policy allowing the inclusion of APCs for hybrid journals. The UKRI stated object of having the research it funds available open access is met equally well via either a pure OA journal or a hybrid**

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).

- We would prefer to see funding spent on gold APCs to support a sustainable publishing sector but we recognise that strategic investment in some institutional repositories might offer good value

Q26. **To help accelerate policy adoption, should UKRI introduce any other restrictions on how UKRI OA funds can be used?**
Yes / No / Don't know / No opinion.
Please explain your answer, including any views on how this could be implemented (1,350 characters maximum, approximately 200 words).

Q27. **There are many business models that can support OA. A common model for journals is based on APCs, but there are also other models (such as membership models and**

subscribe to open). Are there changes or alternatives to the present UKRI funding mechanisms that might help support a diversity of OA models?
Yes / No / Don't know / No opinion.
Please expand (2,650 characters maximum, approximately 400 words).

- We are aware that a number of experiments in open access have been tried and indeed our own OA journal was something of an experiment when we set it up. We think attention needs to be paid to the potential for some projects to scale up and we think that some disciplines will more readily make the transition to an open future.
- It is important to recognise that there will innovations in open publishing in the future and space needs to be made for these

Q28. **As discussed in paragraph 74 of the consultation document, transformative agreements are one way of moving to OA in a more cost-effective way. Are there approaches to managing transformative agreements or other mechanisms and developments that UKRI should consider to help manage the transition to OA in a way that is cost-effective and offers public value to the UK?**
Yes / No / Don't know / No opinion.
Please expand (2,650 characters maximum, approximately 400 words).

- The RSA gives support to the view of the Academy of Social Science who suggest that the block grant be used primarily to support the transition to transformative deals with smaller sums available to institutions to support APCs and repositories.
- We ask that allowable models are scalable and for as permissive an approach as possible because innovation flourishes in permissive environments.

Q29. **Are there any existing or new infrastructure services that you think UKRI should fund the maintenance and/or development of, to support the implementation of its OA policy for research articles?**
Yes / No / Don't know / No opinion.
If yes, please state what these are and explain and, where possible, evidence why UKRI should provide support (2,650 characters maximum, approximately 400 words).

Q30. **To what extent do you agree or disagree that UKRI should provide or support a national shared repository?**
Strongly agree / Agree / Neither agree nor disagree / Disagree / Strongly disagree / Don't know / No opinion.
Please explain and, where possible, evidence your answer (1,350 characters maximum, approximately 200 words).

- The RSA does not support the establishment of a national repository as this seems to be a duplication of effort and is unlikely to be of a scale to supercede all existing institutional repositories. Publishers offer secure sites for deposit and could offer preprint servers in the same way. This would be costly and that money could fund APCs or support transition to transformational deals

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.)

- Preprints certainly have a role to play at a time of national/public emergencies, but their use could be encouraged at all times, rather than only at these times.
- As stated earlier there could be a role for preprint servers as a stronger feature in scholarly communications as this meets the stated need for research outputs to be freely and immediately available. There are now many preprint servers available across the disciplines – SocArXiv and SSRN in AHSS. They seem (anecdotally) to be attracting deposits with DOIs. Where researchers subsequently publish the work, it could be linked back to the preprint to avoid version confusion.

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).

- To encourage the use preprints it needs to be make clear to all that a preprint is not an obstacle to publication

Section B: Monographs, Book Chapters and Edited Collections

Q33.   **To what extent do you agree or disagree that the types of monograph, book chapter and edited collection defined as in-scope and out-of-scope of UKRI's proposed OA policy (see paragraphs 96-98 of the consultation document) are clear?**
Strongly agree / Agree / Neither agree nor disagree / Disagree / Strongly disagree / Don't know / No opinion.
If you disagree, please explain your view (2,000 characters maximum, approximately 300 words).

- We see a potential issue where the editors of a collection acknowledge UKRI funding but not all contributing authors are funded. This could be a reasonably regular occurrence and should be thought through and policy adjustments made
- The definition of trade books looks somewhat narrow and may cause issues

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).

- Many early career researchers in AHSS publish their theses as monographs and may struggle to find APC support. It will generally be important to consider issues of inclusion and diversity
- Sales of books that the RSA publish tend to be small. The margins are very small indeed and books are not a material source of income for the Association BUT they are very important to our members and community. In general, we would argue for permissive policies and long embargos so that they remain viable for us to publish and accessible to our members and wider community to publish.
- If books are to be included within the UKRI policy the APC funding should be made available to support publication

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).

- This makes perfect sense in a sector where there are many small publishers who offer alternative and often specialist imprints to the community

Q36. **Are there any other considerations that the UK HE funding bodies should take into account when defining academic monographs, book chapters and edited collections in-scope of the OA policy for the REF-after-REF 2021?**
Yes / No / Don't know / No opinion.
If yes, please expand (2,000 characters maximum, approximately 300 words).

Please see paragraphs 29-31 of the consultation document before answering this question.

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).

- The Regional Studies Association has a well-established books series that it publishes with Taylor and Francis Books company. We have carefully reviewed our sales figures and see that we make the majority of our hardback sales in the first 12 months following publication. But we make the majority of our ebook sales and paperback sales after this time. Our concern would be that with a 12 month embargo the librarians would not purchase the book and would wait for the OA version to become available. If this happened we would have to abandon our paper back print which follows some time after hard back if the sales justify it and we would lose income on all three forms of the book. That would mean the series was no longer viable financially.
- Although we do not make money from our books programme our community uses it and it is well regarded. We would like to continue offering this and therefore
- **We ask that UKRI consider an embargo of preferably 36 months and undertake pilot tests while the effects of OA and books is explored.**
- **We also ask that it be recognised that funding needs to be found to successfully support open access book publishing**

Q38. **Regarding book chapters in-scope of UKRI's proposed OA policy, which statement best reflects your view on the maximum embargo requirement of 12 months?**
   a. 12 months is appropriate
   b. A longer maximum embargo period should be allowed
   c. A shorter maximum embargo period should be required

  d. Different maximum embargo periods should be required for different discipline areas

  e. Don't know

  f. No opinion

Please explain and, where possible, evidence your answer. If you answered b, c or d please also state what you consider to be (an) appropriate embargo period(s) (1,350 characters maximum, approximately 200 words).

- We refer you to the British Academy's report Open Access and Book Chapters (2019), which found for Green Open Access 'the most commonly stipulated embargo periods are 12 months (sometimes explicitly for science books), and 24 months (sometimes implicitly for humanities and social sciences books).'

- **We ask that an embargo of not less than 24 months be considered in social science and reiterate the need for funding to be available in the area of books as well as journal publishing**

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).

- Please see our response to question 37. We would have serious concerns that edited collections sales would drop in the first 12 months of a short embargo.

Q40. **Do you have any specific views and/or evidence regarding different funding implications of publishing monographs, book chapters or edited collections with no embargo, a 12-month embargo or any longer embargo period?**

Yes / No.

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

Please note that funding is further considered under paragraph 110 of the consultation document (question 53).

- We are unable to answer this in the level of detail that we would like but we urge caution. Too short an embargo may see commercial publishers withdrawing from their partnerships with Associations such as our own where surpluses from series are slender already. A danger would be that the big players of GAFA (Google Amazon, Facebook, Apple) may see a space in which they could operate. In particular Amazon already has capacity in this area and

perhaps has only not acted because of low profits. This would of course lead to market consolidation, lack of diversity and associated weakening of the research ecosystem.

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).

- We would prefer not to see the green route in relation to books but if it must be used then there needs to be ways to tie this to the version of record and it would be unreasonable to ask publishers to set up infrastructure to facilitate the self-archiving while the policy reduces income to them and to societies.
- The length of embargo would remain important in this case to allow publishers and societies to recoup the costs of their investment

Q42. **Regarding monographs, book chapters and edited collections, are there any additional considerations relating to OA routes, deposit requirements and delayed OA that the UK HE funding bodies should take into account when developing the OA policy for the REF-after-REF 2021?**
Yes / No / Don't know / No opinion.
If yes, please expand (2,650 characters maximum, approximately 400 words).

Please see paragraphs 29-31 of the consultation document before answering this question.

- As under the journals section we consider it unlikely that there will be sufficient funding to cover the volume of material that will be subject to REF. An OA requirement for books may raise questions including equality of access to funds for all researchers but it also raises important questions around the length of embargos and given the volume of material that may be involved specific consideration should be given to an absolute minimum of 24 and preferably 36 months because of the danger of loss of sales and income to publishers and societies and subsequent withdrawals from book publishing
- We recognise that book chapters may be subject to different rules as an exception.

Q43. **To what extent do you agree or disagree with CC BY -ND being the minimum licensing 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).

- There is evidence for this in the UUK report Open access and monographs: Evidence review (2019).

Q44.   **To what extent do you agree or disagree that UKRI's OA policy should include an exception for in-scope monographs, book chapters and edited collections requiring significant reuse of third-party materials?**
Strongly agree / **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.

- Although this is not an imperative in our field, we are aware that in the humanities there are strongly held feelings and therefore we believe that it is worthy of serious consideration.

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).

- Having a "tombstone" would be far from ideal but it may be the only way practicable

Q46.   **Do you have a view on how UKRI should define 'significant use of third- party materials' if it includes a relevant exception in its policy?**
Yes / No / Don't know / No opinion.
If yes, please expand (2,000 characters maximum, approximately 300 words).

Q47.   **Do you have any other comments relating to licensing requirements and/or the use of third-party materials, in relation to UKRI's proposed OA policy for academic monographs, book chapters and edited collections?**
Yes / No.
If yes, please expand (1,350 characters maximum, approximately 200 words).

Q48.   **Regarding monographs, book chapters and edited collections, are there any additional considerations relating to licensing requirements and/or third-party materials that you think that the UK HE funding bodies should take into account when developing the OA policy for the REF -after-REF 2021?**
Yes / No / Don't know / No opinion.
If yes, please expand (2,650 characters maximum, approximately 400 words).

Please refer to paragraphs 29-31 of the consultation document before answering this question.

- The licencing requirement should permit the inclusion of ND for future REF policy.

Q49. **Which statement best reflects your views on whether UKRI's OA policy should require copyright and/or rights retention for in-scope monographs, book chapters and edited collections?**
    a. UKRI should require an author or their institution to retain copyright and not exclusively transfer this to a publisher
    b. UKRI should require an author or their institution to retain specific reuse rights, including rights to deposit the author's accepted manuscript in a repository in line with the deposit and licensing requirements of UKRI's OA policy
    c. UKRI should require an author or their institution to retain copyright AND specific reuse rights, including rights to deposit the author's accepted manuscript in a repository in line with the deposit and licensing requirements of UKRI's OA policy
    d. UKRI's OA policy should not have a requirement for copyright or rights retention
    e. Don't know
    f. No opinion
Please explain and, where possible, evidence your answer. If you selected answer b or c, please state what reuse rights you think UKRI's OA policy should require to be retained (2,000 characters maximum, approximately 300 words). It is not necessary to repeat here, in full, information provided in response to question 12.

Please note that views are not sought on whether institutions should hold the copyright to work produced by their employees as this is subject to Section 11 of the Copyright, Designs and Patents Act 1988 and institutional copyright policies.

Q50. Regarding the timing of implementation of UKRI's OA policy for monographs, book chapters and edited collections, which statement best reflects your view?
    a. The policy should apply from 1 January 2024
    b. The policy should apply earlier than 1 January 2024
    c. The policy should apply later than 1 January 2024
    d. Don't know
    e. No opinion
Please explain and, where possible, evidence your answer. If you selected b or c, please also state what you consider to be a feasible implementation date (2,000 characters maximum, approximately 300 words).

- The policy should give sufficient time for stakeholders to prepare and for grant funders to alert grant winners to how to access funding in order to comply given that they may have applied several years before the implementation date

Q51. **In order to support authors and institutions with policy implementation UKRI will consider whether advice and guidance can be provided. Do you have any suggestions regarding the type of advice and guidance that might be helpful?**
Yes/ No.
If yes, please expand (2,000 characters maximum, approximately 300 words).

Q52.   **Regarding monographs, book chapters and edited collections, are there any other considerations that UKRI and the UK HE funding bodies need to take into account when considering the interplay between the implementation dates for the UKRI OA policy and the OA policy for the REF-after-REF 2021 OA?**
Yes / No / Don't know / No opinion.
If yes, please expand (2,650 characters maximum, approximately 400 words).

Q53.   **Do you have any views regarding funding levels, mechanisms and eligible costs to inform UKRI's considerations about the provision of funding for OA monographs, book chapters and edited collections in - scope of its proposed policy?**
Yes / No.
If yes, please expand (2,650 characters maximum, approximately 400 words).

   - It is important to our Association to be able to continue to offer books and this does mean that the publishers need to be able to recoup their costs. There is a need for more learning about the impact of OA in book publishing

Q54.   **To support the implementation of UKRI's OA policy, are there any actions (including funding) that you think UKRI and/or other stakeholders should take to maintain and/or develop existing or new infrastructure services for OA monographs, book chapters and edited collections?**
Yes / No / Don't know / No opinion.
If yes, please state what these are and, where relevant, explain why UKRI should provide support (2,650 characters maximum, approximately 400 words).

Q55.   **Are there any technical standards that UKRI should consider requiring and/or encouraging in its OA policy to facilitate access, discoverability and reuse of OA monographs, book chapters and edited collections?**
Yes / No / Don't know / No opinion.
Please expand (2,000 characters maximum, approximately 300 words).

Q56.   **Do you have any other suggestions regarding UKRI's proposed OA policy and/or supporting actions to facilitate access, discoverability and reuse of OA monographs, book chapters and edited collections?**
Yes / No / Don't know / No opinion.
If yes, please expand (2,000 characters maximum, approximately 300 words).

Section C: Monitoring Compliance

Q57. **Could the manual reporting process currently used for UKRI OA block grants be improved?**
Yes / No / Don't know / No opinion.
If yes, please explain how (2,000 characters maximum, approximately 300 words).

Q58. **Except for those relating to OA block grant funding assurance, UKRI has in practice not yet applied sanctions for non-compliance with the RCUK Policy on Open Access. Should UKRI apply further sanctions and/or other measures to address non-compliance with its proposed OA policy?**
Yes / No / Don't know / No opinion.
Please explain your answer (2,000 characters maximum, approximately 300 words).

Q59. **To what extent do you agree or disagree with the example proposed measures to address non-compliance with the proposed UKRI OA policy (see paragraph 119 of the consultation document)?**
Strongly agree / Agree / Neither agree nor disagree / Disagree / Strongly disagree / Don't know / No opinion.
Please explain your answer (2,000 characters maximum, approximately 300 words).

Section D: Policy Implications and Supporting Actions

Q60. **Do you foresee any benefits for you, your organisation or your community arising from UKRI's proposed OA policy?**
Yes / No / Don't know / No opinion.
Please expand (2,650 characters maximum, approximately 400 words).

- The RSA supports the shift to open access and the wider accessibility of scholarly research. The potential influence of our members work in evidencing and guiding policy would help us to demonstrate the achievement of our charitable aims and objects. Our concerns would include equity in the system for all authors regardless of career stage and geography, the global nature of our publishing and the need to comply with many policies and a creeping effect of many policies leading to financial distress.

Q61. **Do you foresee UKRI's proposed OA policy causing and/or contributing to any disadvantages or inequalities?**
Yes / No / Don't know / No opinion.
If yes, please expand, referencing specific policy elements and including any comments on how UKRI could address any issues identified (2,650 characters maximum, approximately 400 words).

- The Association is extremely concerned about potential effects of the policy in relation to hybrid journals. If these are not supported it significantly reduces the choice of publications for researchers, cutting them off from their natural publishing communities.
- We are also concerned to ensure that readers have access to materials and if publishing venues are restricted this would necessarily be affected.
- We seek a future with equality of access to open access funding across career stages and institutions – this will be difficult to achieve.
- Researcher choice isn't just about academic freedom its about supporting a flourishing and collaborative research ecosystem and OA policy should help and not hinder dissemination.
- We use this question to make the point that "funding through the front door" which has been discussed is not a secure base for societies and is likely to put societies in competition with each other working against the interests of science
- We also wish to underline the important of taking all the key stakeholders on the OA journey – funders, researchers, societies and publishers …

Q62. **Do you foresee any positive and/or negative implications of UKRI's proposed OA policy for the research and innovation and scholarly communication sectors in low-and-middle-income countries?**
Yes / No / Don't know / No opinion.

If yes, please expand, referencing specific policy elements and including any comments on how UKRI could address any issues identified (2,650 characters maximum, approximately 400 words).

- The RSA has significant membership in low and middle income countries to the extent that we launched a ground breaking journal focussing on work done in and on the Greater BRICs. Part of the offer from Area Development and Policy is a more active editorial process assisting researchers but particularly this journal allows authors to write in their own territorial tradition, citing local theoreticians rather than EuroAmerican authorities, being more descriptive in style etc. The hybrid model has facilitated this development.
- We see hybrid journals as an accessible way for these researchers to publish and would wish to see them included within UKRI policy. If hybrids flip to an APC model this will challenge researchers in environments that do not support this model.
- The Association is included in a range of philanthropic programmes run through our publisher allowing access to a range of low-income countries.

Q63. **Do you anticipate any barriers or challenges (not identified in previous answers) to you, your organisation or your community practising and/or supporting OA in line with UKRI's proposed policy?**
Yes / No / Don't know / No opinion.
If yes, please expand, including any supporting actions you think UKRI could undertake to remove or reduce any barriers identified (2,650 characters maximum, approximately 400 words).

- There are potential risks to the Association if UKRI policy is extended to include the REF after REF 2021 because of the scale of articles that it would affect in our journals.

Q64. **Are there any other supporting actions (not identified in previous answers) that you think UKRI could undertake to incentivise OA?**
Yes / No / Don't know / No opinion.
If yes, please expand (2,000 characters maximum, approximately 300 words).

- We are doing our best to inform the research community about the shift to open access and changes in OA policy but general awareness remains low. UKRI could do much to assist in the education of researchers in the UK.

Q65. **Do you foresee any other implications (not identified in previous answers) for you, your organisation or your community arising from UKRI's proposed OA policy?**
Yes / No / Don't know / No opinion.
If yes, please expand (2,000 characters maximum, approximately 300 words).

- It is important that in the movement to an open future all parts of the community are taken. The Association is very concerned that an outcome of the policy will be to restrict publishing venues open to UK authors without APCs. This would be an unfortunate and surely unwanted outcome from policy. We are concerned that the financial consequences of too fast a move may be difficult for a small sector that does not receive direct government funding to survive. We would like to see policies rolled out that allow

time for the community to adjust to the changes that are already taking place and which support arrangements that are sustainable such as the transformational deals.

Section E: Further Comments

Q66.   **Do you have any further comments relating to UKRI's proposed OA policy?**
Yes / No.
If yes, please expand (2,650 characters maximum, approximately 400 words.)

Q67.   **Do you have any further comments relating to commonality between UKRI's proposed OA policy for outputs acknowledging UKRI funding and the OA policy for the REF-after-REF 2021?**
Yes / No.
If yes, please expand (2,650 characters maximum, approximately 400 words.)

Q68.   **Do you have any further thoughts and/or case studies on costs and/or benefits of OA?**
Yes / No.
If yes, please expand (2,650 characters maximum, approximately 400 words).

ends