

# Response ID ANON-RE72-PNYN-5

Submitted to REF 2029 Open Access Consultation  
Submitted on 2024-06-07 16:40:50

## Transparency Statement

### Your Details

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

Organisation or institution

2 What is your organisation/institution?

Organisation:  
Association of Hispanists of Great Britain and Ireland (AHGBI)

3 Country

Other (Please state below)

Other:  
Great Britain (we also represent Ireland although not relevant here)

### Section A: open access developments in the sector

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

OA landscape changes:

Since the development of the REF 2021 Open Access policy, the principle that journal articles should be published in OA is widely accepted across the research communities in our discipline (Spanish and Portuguese Studies, Hispanic Studies, Latin American Studies). However, there is so far only limited progress towards providing a similar supportive infrastructure for OA for longform publications.

Significant progress has been made towards OA, but mandating compliance for individual outputs will create imbalance and threaten research excellence.

While we agree in principle that publicly funded research should be freely available, we believe that if the costs of OA make excellence in research prohibitive, the move to OA for long-form publications should be paused or rethought.

We do not find that the current proposals comply with Tickell's recommendations.

We are concerned that REF 2029's mandates towards more immediate access will need to rely on institutional funding of paid agreements. Our sector is currently seeing the closure of many departments. The proposed extension of the OA requirements to longform may mean that institutions see this as a step too far to continue to fund departments. The likely outcome is detrimental damage to the discipline. Even elsewhere the costs of OA for institutions will be prohibitive. The number of eligible outputs may be restricted due to cost, which will undermine the status of UK research globally. The extension of OA to longform publications may well interfere with our ability to be world-leading in the sense that we have not seen evidence that publishers will be happy with the new arrangements or how or if they have been consulted. The claim that publishers will be happy with a two year embargo is thus far unsubstantiated. These new requirements will narrow authors' options when choosing a publisher. A Latin-American or Spanish/Portuguese language publisher may not be able or willing to meet the OA requirements of UK HE - the same may be true of US university presses.

In the case of multi-author longform books, where some authors are working outside of the UK, we cannot expect authors from other countries to be expected to fund the processing charges for OA. Monographs may be seen as too expensive or too risky but in the Arts and Humanities the longform monograph often has the potential to make deep impact on the field as well as to reach wider, more generalist audiences.

With the new focus on an enhanced PCE section for REF 2029, an opportunity has been lost to embed open access across our research practices. If OA were disentangled from the longform publication and instead institutions were permitted to discuss the progress they have made towards OA across the board in the context of their circumstances, we find that this would be a more balanced and inclusive approach while still retaining the ambition to make moves towards the free availability of publicly funded research.

### Section B: journal articles and conference proceedings

#### Section B: publication, deposit

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

No

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

#### Section B: access, licensing

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

No

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

The sector remains concerned that there are insufficient safeguards currently in place to prevent data mining, harvesting and unattributed reuse of research (through, for example, AI). REF 2029 should mandate that safeguards be a required stipulation. There is a mismatch between CC-BY and CC-BY-ND licenses and current press requirements for Green Access.

### Section B: pre-prints, alternative platforms

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

Yes

Please provide any further comment:

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

### Section B: embargo periods

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

No

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

We see no need to reduce the embargo periods for journals and have concerns that some of the most well-regarded journals may opt out.

### Section B: tolerance limits, implementation date

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

No

Please provide any further comment:

We see no reason to adopt these changes so fast and mid-cycle. We suggest that any changes should be adopted from the beginning of the new cycle.

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

No

please provide any further comment :

We are concerned that the 5% tolerance limit can be burdensome for small institutions without a large number of administrative staff. This feels like an additional bureaucracy that is out of step with Tickell's recommendations. We prefer a more holistic approach given the added weight afforded PCE.

### Section B: exceptions

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

Yes

Should any of the above be removed?:

No. We ask for the greatest flexibility possible with regard to exceptions.

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

Considerable care is required to consider articles that may attract hostile responses or harassment from organisations, regimes or where the increased searchability is likely to expose individuals to risk or danger.

Consideration of co-authored volumes with researchers working outside of the UK - mandating the form of publication of work partially produced by those not funded by UKRI would seem to be outside of the scope of the REF exercise.

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

## Section C: publication, deposit and embargo

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

No

Please provide further comment:

The risk of pushing toward a broad and unfunded OA longform publishing mandate too soon is that it will heighten inequalities in the research profession, not just for e.g. ECRs and those not in receipt of external research funding, but also between universities that have publishing houses attached versus those that do not, as well as between previously-funded authors with access to the UKRI long form publishing fund and those without prior funding. Researchers may also opt for a UK publisher or one that can support OA requirements at low cost rather than seeking the most appropriate publisher. There are potential detrimental implications for research quality and research integrity.

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

No

Please provide any further comment:

It would be better to postpone longform OA to the start of a future REF than impose this limited embargo that may not work well for second editions/ paperback editions.

## Section C: access, licensing

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

Yes

Please provide any further comment:

In some cases excluding third party materials to meet OA requirements will compromise academic integrity of the work. This is grounds for exception.

15 Is sharing of a version of an output without third-party materials if licensing can't be obtained, mirroring the UKRI open access policy for longform outputs, appropriate to meet the open access requirements for REF 2029 policy?

Not sure

Does this present issues for output submission and assessment?:

## Section C: tolerance level

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

Yes

Please provide any further comment:

A tolerance level for non compliant longform publications is essential. A shift to OA for longform publications constitutes a dramatic policy change for which there is currently no infrastructure.

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

No

Please provide any further comment:

If longform publishing is included in this REF, which is not our preference, it should have a substantially higher tolerance level to represent a commitment to the principle without placing undue financial burden on institutions. There are risks that researchers who are not funded by UKRI may be excluded.

## Section C: implementation

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

No

Please provide any further comment.:

We recommend a start of a future REF rather than mid-cycle which will create anomalies in the process.

### Section C: exceptions

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

No

Should any of the above be removed?:

None should be removed. We also wish to know how appropriateness will be determined. We strongly support Research England's suggestion that cost to the institution might need to be factored into appropriateness.

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

We would like to see more clarification over what is meant by 'trade book' - are cross-over books to feature here, for example?