

REF2029 Open Access Consultation - Position statement from smaller and/or specialist institutions

GuildHE Research, Conservatoires UK, and the Royal College of Art recently held an engagement session with Research England to discuss the Open Access proposals for REF 2029, revealing common concerns that are summarised in this position statement. We hope that it provides similar institutions with starting points for their own deliberations about the proposals.

Our concerns

Disproportionate financial burden. This is especially concerning in relation to the shortening of embargo periods, low tolerance levels, the licence requirements and the introduction of the longform publications requirement. For the latter, proposals don't account for the lack of financial support available to achieve it, or that the UKRI policy, and associated funding, is untested. In a challenging financial period, resources could be better spent elsewhere to support open research.

Equity and diversity implications. Do the requirements make compliance more challenging for smaller institutions and certain disciplines? Does the policy really allow the recognition of research excellence across a distinct and diverse sector? We question the ability of all researchers and institutions to comply and find parts of the proposal exclusive.

The publishing landscape. Are publishers ready and willing to adjust to this change? What will the impact be on burden, academic choice and the diversity of the publishing landscape? The proposals risk dictating where and in what format research is published, having implications for robustness, quality, and potentially researchers' careers. For many institutions the number of exceptions that will be necessary for longform publications will be a burdensome task.

Licensing and copyright. The implications and cost of licensing, managing third party material and copyright requirements, especially for creative and arts based research, have not been adequately considered.

Invisibility of alternative routes. There is a lack of visibility of the viability and range of other options and alternative routes to publishing OA. Funding bodies need to take action to promote these options and the sector needs more time to familiarise themselves and embed behaviours in this area.

Administrative burden. The REF OA policy does not reflect commitments to reduce research bureaucracy, as recommended in the Tickell report. Tinkering with compliance rules will create different burdens not eliminate them. We see great potential for approaching OA in a less directive and compliance driven way, such as articulating the progress made to support open research practices in a qualitative way within People, Culture and Environment statements. This would reduce administration and allow each institution to more positively and proactively demonstrate a commitment to Open Access.

We recommend the funders:

1. Assess support for Open Research within People, Culture, and Environment
2. Postpone Open Access longform requirement
3. Lengthen journal article embargo periods
4. Extend the range of applicable licences
5. Delay implementation of requirements and have one date for all policies
6. Include an exception for outputs where licences for third-party material can't be acquired