

**British Sociological Association (BSA) Submission to The House of Lords Science and Technology Select Committee Short Enquiry into the implementation of Government Open Access Policy.**

1. BSA welcomes the opportunity to submit evidence to the House of Lords Science and Technology Select Committee on the implementation of Government Open Access Policy.
2. BSA supports the overall aim of opening up access to the results of academic research to the wider community and notes this can be achieved by a variety of means including the Gold and Green access models that have been put forward as well as schemes to license publications and open HEI libraries to a broader public which so far have received little attention.
3. However, we have strong concerns that current policies are being pushed through too quickly, without thinking through all the implications of change, with minimal modelling of the effects of change and little concern for the effects of implementation on universities, research and publication in different disciplinary areas, and the viability and survival of learned societies which are essential to the health of academic disciplines.

**Support for Universities in the form of funds to cover article processing charges, and the response of universities and other HEIs to these efforts**

4. Under current proposals limited funds are being made available to universities to pay the costs of APCs. We are concerned that this funding is inadequate to support the current level of research article publication. Many universities will get little or no additional funding to cope with the additional costs of publication in the short and medium term.
5. Only 30 research intensive universities received extra funds from the Science budget, meaning that for the majority of institutions there is no extra money to pay for APCs. Other funds are coming from RCUK on a basis that relates to historic funding. These are unlikely to meet the costs of publishing all the papers resulting from RCUK funded research.
6. Much research in Sociology, and other disciplines in the social sciences and humanities, is not funded from research council grants and takes place outside of the 30 institutions that received modest extra funding. The publication of this research will not therefore benefit from any additional funding in this transitional period and any APCs would have to be funded from QR money – thus reducing the funds available for research. At the same time, the distribution of QR income is becoming increasingly concentrated among the same group of universities benefiting from the additional funding from APCs. Therefore, academics working in

sociology and other HSS disciplines may find it very difficult to find funds for the publication of their research.

7. Less funding for research is also likely to mean that the paid time of academics at these institutions will be further squeezed, resulting in the reduction of the time given to the peer review and editorial functions which are essential to the health of journals and the proper dissemination of research.
8. Institutions are likely to have to pay journal subscriptions for some considerable time given that the amount of funding made available will be inadequate to fund all publications on a Gold Access basis. There is, therefore, little prospect of any substantial reduction in library budgets because subscriptions are sold primarily in bundles which may include open access and non-open access journals (e.g. international); and there will be a need to maintain access to subscription content (i.e. non-UK research) and to back issues. Academics in many institutions will either be priced out of journal publication or their institutions will have to make cuts elsewhere in order to fund publication. This could lead to a significant drop in the number of articles submitted for publication and a reduction in the dissemination of UK research findings to academics, the government and other stakeholders as well as the general public.
9. The concentration of funding for publication particularly threatens the development of postgraduate students and early career researchers in the social sciences. They may find they are excluded from publication and therefore cannot be entered for the REF and will find their research careers stymied today before they can become tomorrow's research leaders. Retired academics and practitioners outside the academy may also be excluded from publication if they are unable to access APC funds.
10. BSA also sees a threat to academic freedom as academics will have to compete internally within their institutions for APCs. Publication will therefore not rest on the quality of work done and peer reviewed by subject experts, but will be judged by academic managers and committees, who may be influenced by internal academic politics, subject to the pressures of allocating scarce resources without necessarily being able to make specialist quality judgements which are the business of the journal editors and peer reviewers.
11. In a hybrid model of open access there is a further danger that there could be pressures on editors to give preference to papers that are subject to pre-payment. This would be an unacceptable development that would undermine the reputation of UK journals and threaten their rating and standing.

### **Embargo periods for articles published under the green model**

12. It is clear that many journals will offer hybrid models of gold and green open access. The embargo time under hybrid models or under green access alone is, therefore, an important issue for the future of journals.
13. There are significant differences between STEM and HSS disciplines regarding the effective useful life of articles. Currency passes much more quickly in the STEM subjects so a shorter embargo period (under green open access) may be appropriate. The useful life of articles in the HSS is significantly longer. In HSS journals, the majority of article usage is to articles older than 1 year. We do believe that this is the case with sociology and most other social science subjects. The most highly cited articles in the BSA's flagship journal were published between 2002 and 2007. An embargo period of 24 months seems more reasonable than one of 6 to 12 months, if subscription income is to be maintained for journals.
14. Embargo periods that enable the maintenance of some subscription income will allow journals to survive during the transition to open access publishing. Without subscription income, the level of APCs likely to be charged in HSS will threaten the viability of rigorously peer reviewed journals and thus the dissemination of the research that they enable.

### **Engagement with publishers, universities, learned societies and other stakeholders in the development of research council open access policies and guidance**

15. As a learned society, much of the funding that supports the work of the BSA comes from journal subscriptions. The cost of our current range of activities is not met by membership subscriptions and income from events and conferences alone.
16. Like other learned societies we face the prospect of drastic reductions in the services we will be able to offer our members and new entrants to our profession such as postgraduates, early career researchers and researchers outside the academy. We currently provide space and opportunities to connect researchers in Sociology, drawing attention to UK academia and attracting international specialists into the UK. We promote, support and nurture our discipline in an independent and dedicated way that no other institution or organisation can do.
17. The income received from academic journals is reinvested in the guidance, support, training and networking events, publications, peer review and award schemes which support the future of UK academic disciplines. We also function as a conduit of advice to the government and funding bodies by direct response to consultations and the facilitation of consultation

- meetings, through, for example, the co-ordination of responses, provision of meeting venues, and funding of travel and accommodation.
18. Whilst we are still attempting to model the likely impact of current proposals and policies, it is already clear that many of these important activities are under threat. In particular, the learned society support for peer review, editorial functions, author services and general support/advice on publishing will be some of the first services to be lost. More time is needed for any transition to new systems and for the development of new business models if learned societies and our important contribution to knowledge creation and professional development is to be protected.
19. We are also concerned about the future of peer review. Although it is largely done by academics at different HEIs, it is not an activity organised by those HEIs. It depends upon the identification that academics feel for their subject, or for the specific topic of the journal. This, in turn, depends upon a sense of reciprocity that publishing in journals carries a responsibility to review for journals. APCs potentially undermine that responsibility. At the same time, any asymmetry in distribution of funds for APCs will not only undermine the idea of equal access to publish, but also potentially have consequences for the willingness to review, further damaging the rigour and quality of journals.

### **Challenges and concerns raised by the scientific and publishing communities, and how these have been addressed**

#### International Issues

20. The speed with which the UK government is moving on open access does not seem to take account of the international dimensions to such a general change and the very uneven approach to open access issues globally. In particular, there is a danger that UK academics may not be able to publish their research in highly rated journals published overseas, journals in countries with differing or no OA policies, which, like the USA, may not be OA compliant. This will restrict the international publishing opportunities of UK academics because RCUK funded research (and possibly in the future all publically funded research) must be published in OA compliant journals. It potentially harms the development of world class research in the UK if publication becomes insular. This will also be critical if the next REF exercise in 2020 imposes similar criteria to those put forward by RCUK.
21. The top journals publish a mix of UK and international research, bringing the best research to the UK and the best of UK research to an

international audience. To welcome and accept submissions from international academics without funds for APCs, UK journals will need to sustain a hybrid model with a suitable embargo period (24 months). This will be essential to fulfilling the international role of UK journals.

#### Creative Commons License

22. Under the current Open Access policies, research will be published under the CC BY (Creative Commons license) which allows unrestricted distribution, reuse and remixing of any material as long as the original author is credited. This license allows parts or all of a piece of work to be distributed, built upon, changed, remixed, etc. for both commercial and non-commercial purposes and could mean that research and data is used in unintended ways with the original author's name associated. We believe that this is a threat to the intellectual property rights of authors and opens up the potential misuse of academic research. We would advocate instead the use of a CC BY NC ND (creative commons non-commercial non-derivative) licence; that is, it will not allow commercial reuse, or tweaking or reuse of parts of an article.

#### **Conclusion**

23. BSA believes that future developments in open access need to engage much more fully with the academic community, taking account of the range of academic disciplines, their learned associations and their particular issues.
24. The BSA believes that further consultation with the learned societies is needed to fully understand the implications of policy developments. The RCUK implementation date of 1 April 2013 is too rapid and has allowed no time for consultation, research and consideration of the effects of Open Access policies on HSS disciplines and the learned societies.
25. In particular, there should be no hasty decisions about REF 2020. We are disturbed by suggestions that all research conducted in UK universities should be defined as publically funded and therefore might come under prescriptive policies by HEFC. Since new funding regimes are steadily reducing the flow of public funds into the social sciences and humanities, this is not justifiable. Only QR, research council or other government grant funded research can in our view be seen as publically funded research. Should QR income be concentrated further after REF 2014, this will mean that significant research activity is undertaken without public funding.
26. The implications of making UK research open access to a variety of UK and non-UK for-profit organisations does not seem to have been fully

considered. These organisations may include for-profit providers of undergraduate degrees with full access to research materials, but without the research demands. The current UK HEIs may be significantly disadvantaged in a competitive market by the declining public funds, the need to meet APC costs while competitors do not have the same demands. The result will not be a level playing field.

27. In our view, it is highly problematic that the Open Access policy is being pursued, just as the proportion of public funding supporting HEIs is declining significantly. We believe that more work needs to be done to develop policies that address the diversity of academic disciplines and the legitimate concerns of all stakeholders. We would support the recommendation of the Academy of Social Sciences for a more detailed enquiry into the implementation of Open Access policies.

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