

MEMORANDUM

To: The Business, Innovations and Skills Department

Subject: BIS Select Committee Inquiry into the Government's Open Access Policy

Date: 7 February 2013

Dear Sir/Madam,

Please find below the written submission of The British Sociological Association to the Business, Innovation and Skills Committee inquiry into the Open Access.

We request to give oral evidence to the Select Committee and the proposed speaker for our oral evidence is the President of The British Sociological Association, Professor John Holmwood.

Please contact us for any additional evidence or to arrange for the giving of oral evidence.

Thank you.

Yours sincerely,

Judith Mudd
On behalf of the British Sociological Association

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British Sociological Association (BSA) Submission to the Business Innovation and Skills Committee Inquiry into Open Access

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Submission to the Business, Innovation and Skills Committee Inquiry into Open Access**Executive Summary**

1. The British Sociological Association (BSA) read 'Accessibility, sustainability, excellence: how to expand access to research publications' – the Report of the Working Group on Expanding Access to Published Research Findings. We read with increasing concern the policies that were subsequently released and the announcements of funding. We have consulted with our membership and they have expressed significant concern. While they are in favour of widening access to research and reducing the financial barriers to knowledge access, they are very concerned by the application of financial barriers to authorship and the right to publish.
2. The BSA supports the principle of widening access to research findings. Making research results widely available could have many positive outcomes. Widening access to published journal articles broadens the reach and impact of our research beyond the academic community in universities – to charities, businesses, those working in the public sector or outside academia and the wider (global) public.
3. However, the current implementation and funding of open access journal publication raises many questions about how such policies will affect research and publishing in the social sciences and the arts and humanities. 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.
4. While the overall principle is laudable, the details of implementation seem destructive. The current policies may widen access to research but may also reduce the ability to publish, or possibly reduce the research that is conducted.
5. **The BSA recommendations are as follows:**
 - 5.1 A re-examination of the recommendations of the Finch Group Report and a slower, more considered move to Open Access;
 - 5.2 Consultation, research and consideration of the effects of Open Access policies on HSS disciplines, the UK in its international context, the position of the Learned and Professional Societies and the funding needed to achieve the goals of OA. This research should include systematic data gathering, modelling and analysis that is properly peer reviewed;
 - 5.3 A delay on the RCUK implementation date of 1 April 2013;
 - 5.4 Systematic research into the condition of the Learned and Professional Societies, their contribution to the scholarly ecosystem and an understanding of the effects of OA policies on them;

- 5.5 A delay to policies relating to Research Excellence Framework 2020 (research evaluation exercise);
- 5.6 Further exploration of suitable licenses for scholarly research.
- 6. Scholarly publishing forms one part of the complex UK research ecosystem. Open Access policies present a major change to scholarly publishing and therefore to the entire research ecosystem. As with all complex systems in the natural world, a change that occurs gradually allows for adaptation and evolution. A sudden change can bring about destruction and extinction.**

About the BSA

7. The British Sociological Association (BSA) is a registered charity and a company limited by guarantee. It is the national subject association or learned society for sociologists in the UK and its primary charitable aim is to promote sociology. It has a membership of over 2,700. It operates a network of over 40 active research interest groups and specialist groups. Research interest groups range in size from 20 people to well over 300. Members of research interest groups do not have to be members of the BSA which means that our research networks are cross-disciplinary, extending beyond Sociology and actively encouraging information exchange. Specialist groups include our postgraduate forum, early career forum and our sociologists outside academia group. We have a busy annual programme of about 70 events each year. Our annual conference is the largest event in our calendar, attracting between 600 and 1,200 delegates. We publish four learned journals and two popular magazines for our members. We also maintain a website and have a lively Facebook following. We are actively involved in the work of the Academy of the Social Sciences and have an External Affairs Group which makes important sociological contributions to policy through consultations; therefore the BSA acts as a conduit for knowledge transfer between active researchers and policy-makers. For more information see www.britisoc.co.uk

How does the BSA contribute to the research ecosystem?

8. Like other Learned and Professional Societies, the BSA exists to promote and support our academic discipline which is Sociology. We are not-for-profit, supporting our work through our membership fees, events income and publishing income. Our publishing income currently provides approximately 45% of our annual income. Our publications are an important member benefit which we provide free or at a subsidized rate to our members. They are also an important aspect of achieving our charitable aims of promoting Sociology and enabling the dissemination of quality sociological research to a broad, international audience.
9. As one of the many Learned and Professional Societies in the UK, we are a key part of the scholarly ecosystem; we provide support, advice, guidance; we connect academics and professionals; we facilitate networking opportunities, continuing professional development, conferences, and dissemination of the latest scholarly research and thinking; we provide quality control and validation for that knowledge. We are independent of institutional politics and public funding and have a dedicated focus on our discipline. We also provide direct financial support to the research ecosystem, such as funding to assist research collaboration and dissemination through meetings and conferences, funding to support PhD students and early career researchers and grants which support research and travel to national and international conferences.
10. We pride ourselves on producing and publishing high quality information and invest considerable resources to ensure such high standards are maintained, for example by employing staff that provide guidance, training and administrative support for our journals. This guidance and support extends to prospective authors, journal editorial teams and peer reviewers through the management of the peer review process and timelines; the coordination and provision of advice and training; the facilitation of editorial board

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activities; and the facilitation of appeals panels which are an integral part of the academic publishing world.

11. Like other Learned Societies, as the national subject association for our academic discipline, we are recognised outside our academic and professional sphere as a very important source of information, with journalists and the general public regularly turning to us for information and advice. Learned and Professional Societies like the BSA are a key part of the scholarly research ecosystem and like any ecosystem, damage to one part leads to many unforeseen problems in other parts of the system.

Topic 1

The Government's acceptance of the recommendations of the Finch Group Report 'Accessibility, sustainability, excellence: how to expand access to research publications', including its preference for the 'gold' over the 'green' open access model.

12. The British Sociological Association (BSA) supports the aims of Open Access (OA), that is of widening access to research but we have significant concerns about the methods of achieving the aim. We are particularly concerned about unintended, negative consequences of a rapid change to the scholarly publishing ecosystem.
13. The BSA understands and supports the overall aim of opening up access to the results of academic research to the wider community and the specific aims stated in the Finch Group Report (p 5). We note that these aims may be achieved by a variety of means, including the Gold OA and Green OA models that have been put forward, as well as schemes to license publications and open Higher Education Institution (HEI) libraries to a broader public which so far have received little attention.
14. We also note that many of the key actions recommended by the Finch report do not seem to have been actioned prior to the implementation of OA policies by Research Councils UK (RCUK). In particular we note the *Key actions: overall policy and funding arrangements* (p 8) in relation to supporting the costs with considered funding increases, gathering and analysing reliable data and reviewing the position of Learned and Professional Societies.
15. Currently, research publications are accessed largely via the subscription model: interested readers pay a subscription fee, or belong to an institution that has paid a subscription to a journal.
16. The proposed Gold model involves an article processing charge (APC) paid to the journal to make the official article of record OA immediately upon publication. APCs can range from £500 to £5000 per article, depending on the journal (anticipated costs of £500-£1500 per article in the social sciences).
17. The Green model involves the author depositing his/her post-peer review article (but not version of record) in an OA repository after a suitable 'embargo period'. Deposit is frequently permitted 6 or 12 months after the publication of the version of record. The publisher informs authors of the embargo period. The repository for deposit may be an

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institutional repository or it may be a subject repository – like PubMedCentral. Access to the version of record is achieved through the payment of a subscription fee – institutional or individual.

18. The BSA is not convinced that the Gold model will achieve the stated aims of the Finch Group Report, particularly as the funding provided so far is inadequate to cover the costs associated with this model. The Finch Group Report estimated £50-60m a year (£38m specifically for publications charges) to aid the transition to Gold (p 11) and this level of funding has not been provided. To date, funding seems to be £27m in total, as far as we can assess (see paragraph 40).
19. Given that not all publications can be published via the Gold OA route (due to lack of funding), the Gold model will co-exist with the Green model and also with the subscription model. However, a number of unintended, detrimental consequences may result.
 - 19.1 The BSA sees the Gold model as a threat to academic freedom as academics will have to compete internally within their HEIs for APCs. Publication may therefore not rest on the quality of work done and peer reviewed by subject experts, but may 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.
 - 19.2 A multi-tiered publications hierarchy may result whereby research articles published Gold OA are better regarded: they will have been through an additional level of peer review within the HEI in order to have been granted the APC; they will be immediately accessible and more easily discoverable on the internet, increasing their dissemination and impact. However, the articles benefitting from the Gold advantages may not be the highest-quality articles – they will be the ones with access to funding.
 - 19.3 By connecting financial payments to articles accepted, monetary concerns may pressure editorial decisions. It is clear that many journals will offer hybrid models of Gold and Green OA alongside subscription. If the income balance between APCs and subscriptions is not enough to sustain a journal, editors may be under pressure to select articles on the basis of income generation rather than quality. This would be an unacceptable development that would undermine the reputation of UK journals and threaten their rating and standing.
 - 19.4 We are also concerned about the future of peer review and editing. Although peer review and editing is largely done by academics at 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 in return. APCs potentially undermine that responsibility. The inadequate funding and any asymmetry in distribution of funds for APCs among academics may potentially have negative consequences for the willingness to review and edit, further damaging the rigour and quality of UK journals.
20. The BSA is concerned about the survival of journals given the sudden nature of the change imposed by the OA policies. If the UK is to continue to publish high-quality research that has been verified by a rigorous peer review process, the implementation of policies needs to

allow these journals to be financially viable. Given that journals will have to offer the hybrid model of publication – Gold, Green and subscription – the embargo time for the delayed Green OA is, therefore, an important issue for the future of journals. Embargo periods that enable the maintenance of some subscription income will allow journals to survive during the transition to OA publishing. Without subscription income, the level of APCs likely to be charged in the humanities and the social sciences (HSS) will threaten the viability of rigorously peer reviewed journals and thus the dissemination of the research that they enable.

21. There are significant differences between academic disciplines regarding the effective, useful life of articles. Currency passes much more quickly in some subjects so a shorter embargo period (under Green OA) may be appropriate. The useful life of articles in the Sociology and many other disciplines 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 read (downloaded)¹ articles in the BSA's flagship journal have publication dates ranging between 1972 and 2012, demonstrating that a good sociological article has significant value long after publication. 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 – and therefore their health and existence.
22. The BSA is also very concerned about the position of Learned and Professional Societies. We, as with many such societies make a valuable contribution to the UK research ecosystem. We are very likely to experience negative effects from the move to Gold OA. 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. 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.
23. 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.
24. 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

¹ Most Read Articles during January 2013 – updated monthly <http://soc.sagepub.com/reports/most-read> (accessed 07 February 2013)

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.

25. The BSA believes that future developments in OA 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.
26. The BSA believes that further, systematic research into the condition of the Learned and Professional Societies is needed to fully understand the implications of policy developments and ways in which Learned and Professional Societies can contribute to achieving the aims of the Finch Group Report. 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 OA policies on HSS disciplines and the learned societies.
27. In particular, we believe there should be no hasty decisions about the Research Excellence Framework 2020 (REF). REF is the evaluation exercise system for assessing the quality of research in UK HEIs. We are disturbed by suggestions that all research conducted in UK universities should be defined as publicly funded and therefore might come under prescriptive policies by Higher Education Funding Council of England (HEFCE). Since new funding regimes are steadily reducing the flow of public funds into the social sciences and humanities, this is not justifiable. Only the Mainstream Quality Related Research Funding(QR) – provided to universities by HEFCE – research council or other government grant funded research can in our view be seen as publicly funded research. Should QR income be concentrated further after REF 2014, this will mean that significant research activity is undertaken without public funding or that the breadth and depth of research activities is diminished.
28. The BSA recommends a re-examination of the recommendations of the Finch Group Report, involving further systematic research which is properly peer reviewed, and a slower, more considered move to Open Access.

Topic 2

Rights of use and reuse in relation to open access research publications, including the implications of the Creative Commons 'CC-BY' licences.

29. Current Open Access policies require research to 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.
30. The CC-BY license 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.

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Academic research is frequently nuanced and complex. Reuse that is not carefully considered could result in significant misuse or misinterpretation of research findings thereby reducing or negating the value to the reader and the public. In some cases it may be harmful by allowing the dissemination of misinformation or error.

31. Much social science research includes sensitive data, such as that involving vulnerable populations; appropriate reuse is important.
32. Currently, reuse of data is monitored and evaluated by the publishers and authors of that research. The CC-BY license will not allow them to efficiently and systematically monitor reuse.
33. Currently, errors, addenda, additional information, etc. made to an article at, or post, publication are publicized and maintained by the publisher on the Version of Record. Unrestricted reuse of academic research under the CC-BY license will mean that such errors, addenda and additional information is not effectively disseminated to all the reuses of the research. Without access to these elements, the value of the research to the reader and the public may be reduced or negated. As stated above, it may be harmful to allow the continued dissemination of misinformation or error.
34. Under the CC-BY license, commercial reuse is unrestricted. UK and International commercial bodies may benefit financially from such research while not necessarily providing any return for the UK population.
35. Research publications can be enriched with visual material (photos, video, audio). Sociological research can make important use of visuals both as tools for research and as material for analysis. With the CC-BY license, the use of such 3rd party images, video, etc in research publications will require significant attention and management: permission requests, possible cost of compensation to the owner of the image/video/etc. and the monitoring of the reuse will create a significant burden on the publishing ecosystem. The general naivety about intellectual property rights and online reuse is likely to create significant problems for monitoring and enforcing the correct licensing and reuse of research and its 3rd party material.
36. We advocate further exploration of suitable licenses for scholarly research. In the absence of fit for purpose alternatives, we support the use of a CC-BY-NC-ND (creative commons non-commercial non-derivative) licence. This licence will not allow commercial reuse, or tweaking or reuse of parts of an article without permission and possibly compensation to the original author.

Topic 3

The costs of article processing charges (APCs) and the implications for research funding and for the taxpayer

37. The BSA is concerned with the additional costs of Gold OA publication at a time when research budgets are under pressure from many other areas. The addition of significant

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additional costs for publication, which is a necessary research activity, may result in a reduction of research overall, with would be to the detriment of the taxpayer and the UK as a whole.

38. Article processing charges are those paid by an author (or author's HEI) to the publisher to cover the costs of the publication of that article. In return, the publisher makes the article version of record freely available online to anyone who wishes to read it. APCs can range from £99 to £5000 per article, depending on the journal and discipline. APCs represent a significant additional cost to research.
39. 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.
40. Only 30 research intensive universities received extra funds (£10m) from the Science budget², meaning that for the majority of institutions there is no extra money to pay for APCs. Other funds are coming from the RCUK Block grant³ on a basis that relates to historic funding of research in universities. These additional funds are unlikely to meet the costs of publishing all the papers resulting from RCUK funded research. The total funding described here does not match the £50-60m/year estimated by the Finch Group Report (p 11). This funding is also concentrated in particular HEIs, meaning that the access to funding for APCs will be unequal across UK HEIs. At an apparent total of £27m, the shortfall in funding to cover APCs may have to be funded from the Mainstream Quality Related Research Funding (provided to universities by HEFCE) – thus reducing the funds available for research within universities. 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.
41. 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.
42. Researchers without access to funds will either need to opt to publish with the subscription model or the Green OA model. Therefore, academics working in sociology and other HSS disciplines may find it very difficult to find funds for the publication of their research. They will have to resort to the Green OA route (delayed OA) and UK researchers will still need to pay subscription fees to access the latest research and to the version of record.
43. Some supporters of the Gold OA route say that HEIs will be able to pay APCs out of savings on library budgets – once articles are published OA, HEI libraries will not have to pay subscription fees for article access. These savings are unlikely to materialise. Because some

² RCUK welcomes additional investment in Open Access (7 September 2012)

<http://www.rcuk.ac.uk/media/news/2012news/Pages/070912.aspx>

³ RCUK announces block grants for universities to aid drives to open access to research outputs (8 November 2012) <http://www.rcuk.ac.uk/media/news/2012news/Pages/121108.aspx>

research will still be accessible only through subscriptions, institutions are likely to have to pay journal subscriptions for some considerable time. As stated above the amount of funding will not cover APCs for all UK research, therefore access to articles published Green OA will need to be purchased. UK researchers will also need access to the older, non-OA articles of many journals (back catalogues) because these older articles are still of use (see paragraph 22) and that access will need to be purchased. UK HEIs will also need to purchase any international content that is not OA compliant. The non-purchase of any of this journal content could significantly weaken the research produced in the UK. Because journal subscriptions are sold primarily in packages or 'bundles' which may include OA and non-OA content (e.g. international), back content, libraries are unlikely to see any significant reduction in the subscriptions they already pay. There is, therefore, little prospect of any substantial reduction in library budgets and any savings that could be transferred to APCs.

44. Academics in many institutions will either be priced out of journal publication (opting for Green OA delayed by an embargo or subscription publication) or their institutions will have to make cuts elsewhere in order to fund publication. The BSA would also like to draw attention to the position researchers who are based outside of academia. Feedback from our members based outside of academia indicates they will be unlikely to have access to funds for APCs. They may also not have access to an appropriate repository for deposit under the Green model of OA. The result will be that such publications remain published under the subscription model (in the UK or internationally) or go unpublished.
45. It seems very clear that APCs represent an additional burden on research budgets. Either additional taxpayer funding will be required to pay for publication, or the current level of taxpayer funding will cover both research and publication. In the latter case, less research will be undertaken.
46. With APCs adding a great burden to research budgets and HEI finances, one must consider where cuts are likely to be made. Less funding for research may 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.
47. The implications of making UK research OA to a variety of UK and non-UK for-profit organisations do 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.
48. If the aim of OA is to widen the dissemination of research to the tax payer and the general international public, policies which may reduce the amount of research available to disseminate seem counterproductive. Overall research may reduce due to the pressures on research budgets; some research conducted will be published Green OA and therefore only accessible after a delay; budgetary pressures may threaten the survival of some institutions and the research performed there. Therefore, either the taxpayer provides additional funding or we will experience only limited increased access to the research funded by UK taxes.

49. In our view, it is highly problematic that the OA 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 and research into the implementation of OA policies.
50. The BSA recommends a more careful and systematic examination of the funding required to support meeting the true aims of OA and the Finch Group Report. Financial modelling, considering the specific cases of many individual disciplines should be undertaken and peer reviewed by the academic community. Most academics support the aims of OA and would welcome an opening up of research. However, to do so at the risk of the very research they perform is strongly opposed.

Topic 4

The level of 'gold' open access uptake in the rest of the world versus the UK, and the ability of UK higher education institutions to remain competitive.

51. The British Sociological Association believes that Gold OA, as it is current being implemented, poses a risk to the competitiveness of UK higher education systems and to UK research more generally. The UK, China and the US are three top countries producing research in the world⁴. The US and China have made no policy announcements mandating OA, much less Gold OA. Therefore, as of 1 April 2013, the UK alone of its two major competitors will be offering all its research on an OA basis. The isolated position of the UK poses a risk to competitiveness in multiple ways:
- 51.1 Additional financial burden on UK institutions that is not born by the UK's competitors
 - 51.2 As described in paragraphs 38-45, APCs and the associated administrative support will place a significant additional financial burden on UK HEIs. This burden is not being shared by international competitors.
 - 51.3 UK HEIs may also bear an additional financial burden through the support of the Green OA route to publication. The co-existence of Green OA will mean that repositories and associated administrative support will be required to meet OA mandates where funding is not accessible. HEIs will have to continue their investment in repositories.
 - 51.4 As described in paragraph 43, the costs of journal subscriptions to libraries will not reduce and UK HEIs will not experience a financial saving on subscriptions that could be routed to pay APCs. To maintain international competitiveness, UK HEIs will need to purchase continued access to international, non-OA journals and to back issues.

52. Reinforcement of multi-tier publications

⁴The STM Report: An overview of scientific and scholarly journal publishing
http://www.stm-assoc.org/2012_12_11_STM_Report_2012.pdf

- 52.1 The inadequate funding for Gold OA and the use of Green OA as an alternative model may create a hierarchy of publications based on access to funds rather than quality (as described in paragraph 19.2). This hierarchy may be further reinforced by UK journals out of financial necessity in order to retain adequate administrators, editors, peer reviewers and publication technologies. 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' of publication. The hybrid model allows some research to be published OA and other research to be accessible only with a paid journal subscription. This model will be essential to fulfilling the international role of UK journals.
53. Reduction of international exchange with UK research
- 53.1 Current OA policies may restrict the international publishing opportunities of UK researchers. Under current policies, all UK publicly funded research must be published OA. UK academics may not be able to publish their research in highly rated journals overseas because such journals may not be compliant with the UK OA policies. International publication is important to the development of world class research.
- 53.2 The current OA policies may restrict research partnerships and co-authorship involving the UK and international countries. Under current policies, all publications resulting from research wholly or partially funded by public funds will be published OA. Where research results from UK and international collaboration, we assume that the publication will be subject to the OA policies of the UK. This places a significant burden on the international research team to comply with OA policies and locate funds for APCs. Where international collaborations involve countries without significant research budgets or developing world academics, publication funds may be very difficult to locate. These challenges may result in a reduction of international collaborations with UK researchers.
- 53.3 The international competitiveness of UK research will be reduced if publication becomes insular.
54. Reduction in number of UK researchers on financial basis
- 54.1 The financial pressures imposed on publication by Gold OA are likely to make entry into research difficult. These financial pressures are also likely to make advancement in the research job market difficult. The hierarchy of publication (described in paragraph 19.2) will mean that Green OA publications are disadvantaged.
- 54.2 Researchers enter the UK and the international market by publishing research. Publications are the portfolio of an academic and are essential to the CV and to career advancement.
- 54.3 Publications are also significant to HEIs for the assessments of these institutions by the Higher Education Funding Councils. The evaluation exercise for assessing the quality of research is currently called REF - Research Excellence Framework. Publications form a significant part of the evaluation and therefore higher education institutions desire researchers with publications (or with the potential

to publish) to strengthen the REF submission and contribute to the strength of the university overall.

- 54.4 Early career researchers first publications generally result from their PhD research or early research projects. Such research is frequently partially funded (therefore subject to an OA policy) but not accompanied by significant funding for publication; therefore funding must be sought either from the HEI at which the PhD was conducted or from the HEI at which the researcher is hired. Will HEIs provide such funding or will the provision of such funding become another aspect of job negotiations and benefits? The BSA is concerned that the provision of support by HEIs will be limited by lack of funds, subject to research agendas and difficult to win. All academics will be in competition for scarce APC funds and early career academics may be at a disadvantage over their higher profile, more experienced colleagues.
- 54.5 These funding challenges may make publishing first articles via the Gold route difficult and may therefore disadvantage the entry of new UK academics into the industry. Feedback from our membership demonstrates significant concern from PhD students and early career researchers; many do not see academia as a job option if there are to be significant financial barriers to their career progression.
- 54.6 The same difficulties described in paragraph 54.5 may also apply to part-time academics and those who have taken a break from academic activities to have families (particularly female academics).
- 54.7 A consequence of the Gold OA system may be a reduction in the number of researchers entering or remaining in the academy due to the barriers to career progression and this reduction will have been created by access to funds – not by quality of research or abilities.
- 54.8 Significant non-entry into and exit from academic research on financial grounds rather than on quality standards threatens the international competitiveness and the future of UK research.

55. Loss of support from Learned Societies

- 55.1 As described in paragraphs 22-23, learned societies such as the BSA play a significant role in supporting academic research in the UK. As described in paragraph 24, learned societies in the UK are at risk from the sudden loss of journal income. The loss or weakening of UK learned societies as contributors to the research economy will affect the competitiveness of the UK research overall.

56. The BSA recommends consideration of flexible OA policies that can account for the position of the UK in its international context. In order to develop such appropriate policies, we return to our recommendation for systematic data gathering, modelling and research that is peer reviewed.

Recommendations

57. In conclusion, the BSA recommends the following:

- 57.1 A re-examination of the recommendations of the Finch Group Report and a slower, more considered move to Open Access;

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- 57.2 Consultation, research and consideration of the effects of Open Access policies on HSS disciplines, the UK in its international context, the position of the Learned and Professional Societies and the funding needed to achieve the goals of OA. This research should include systematic data gathering, modelling and analysis that is properly peer reviewed;
- 57.3 A delay on the RCUK implementation date of 1 April 2013;
- 57.4 Systematic research into the condition of the Learned and Professional Societies, their contribution to the scholarly ecosystem and an understanding of the effects of OA policies on them;
- 57.5 A delay to policies relating to Research Excellence Framework 2020;
- 57.6 Further exploration of suitable licenses for scholarly research.