

Academy of Social Sciences response to Plan S, and UKRI implementation

1. The [Academy of Social Sciences \(AcSS\)](#) is the national academy of academics, learned societies and practitioners in the social sciences. Its mission is to promote social science in the United Kingdom for the public benefit. The Academy is composed of nearly 1400 individual Fellows, 44 Learned Societies, and a number of affiliates, together representing nearly 90,000 social scientists. Fellows are distinguished scholars and practitioners from academia and the public and private sectors. Most Learned Societies in the social sciences in the UK are represented within the Academy.
2. This response to Plan S is informed by particular concerns relevant to the social sciences. We believe, however, that many of the issues we raise are also more widely relevant, including to some STEM subjects.

Summary

3. The AcSS supports the principle of open access as an important public benefit. A key question though is *how* best to implement this principle, and how to balance it against other principles (academic excellence, autonomy and freedom). Balancing open access is not just a question of balancing one principle against another but considering how *in practice* open access can be broadened, while not undermining the conditions for producing excellent research and ensuring that an appropriate degree of academic autonomy is supported.
4. **Like many other respondents, the Academy of Social Science has concerns about the method and speed of implementation proposed both by cOAlition S and, in the UK, UKRI.** We are concerned that these plans are still accompanied by little detail in many important areas, and little empirical evidence about possible effects on the wider systems and structures within which academic research is produced (as well as consumed), or of the effects on different disciplines. **We do not believe that ‘Gold’ access is the best solution in all cases; we think that Green (and hybrid) journals are capable of meeting aspirations for wider access.**
5. **We believe that cOAlition S, and in the UK, UKRI and others, should engage more widely with a range of stakeholders to consider relevant evidence about systemic effects, looking also at distributional effects (between early career and established researchers; research in different parts of the world; and researchers from different disciplines) and a range of possible**

unintended consequences, including the effects on the social sciences. This should inform proposals about how to implement aims to improve open access, but would require changes to the timetable announced by cOAlition S.

- 6. The Academy of Social Sciences and its member Learned Societies would be happy to co-operate in any such exercise** and to work with others, including the British Academy or the European Alliance for Social Sciences and Humanities, to ensure the effects on all disciplines were taken into account.

Plan S

7. Presentation of [Plan S by cOAlition S](#) started with the publication of 10 principles, followed (after much public debate) with some implementation guidelines about how these principles might work in practice. Although the principles did not mention ‘Gold Open Access’, it is clear that the aim is to ‘flip’ publication models from a ‘pay to read’ subscription model, to a ‘pay to publish’ model, with article publishing charges (APCs) the main mechanism for achieving this change. The proposed timetable is to achieve Open Access via APCs by 2020 for all journals (with monographs to follow shortly), unless transformational deals are struck to allow other hybrid models of widening access. The assumption is that this will also work to reduce publication costs, with later discussions to cap these APCs, requiring transparent information about journal costs.
8. These are transformational aims – the ‘solution’ and ‘shock’ elements of Plan S. The model of change being put forward is that without a short timetable and a radical switch in funders’ publication requirements the desired opening of access to all research will not take place, or will take place too slowly, or will have a degree of double funding of academic publications.

Evidence matters

9. Plan S is proposed as a model of change that seeks a dramatic overnight transformation in the entire academic publishing system on a single preferred model of open access. Yet little evidence has been presented about the consequences of its implementation. The issue of costs – how much, who pays and for what – are at the heart of much of this debate. So too are the issues of distributional consequences – between readers and producers of research, between researchers at different stages of their careers, between those in different parts of the world, and between those in different disciplines.
10. It may first be useful to set out some of the assumptions behind the desire for a sudden ‘flip’ from a ‘pay to publish’ vs. a ‘pay to read’ model. Some of these assumptions may be warranted, but there is little evidence on which to judge many. These include:

- An assumption that most high quality research is funded at a level to include article publication costs. (This is clearly less true in the social sciences, where much published research, including secondary analyses and empirical research, is not externally-funded for particular projects. There are also differences between STEM subjects in the extent to which research is externally-funded.)
 - An assumption that if cOAlition S enlists enough support it will have the financial leverage to ensure the transformational shift it desires. This is made more complex by cOAlition S's agreement that different nations may 'implement' Plan S in different ways.
 - An assumption that changing from a 'pay to read' to a 'pay to publish' model won't have behavioural effects in changing incentives to publish more, less high-quality research, with effects on scientific efficiency, or increase the incentives for further concentration of resource on large publishers, who have economies of scale.
 - An assumption that article processing charges will be more transparent and allow for greater pressures (via an APC cap) in reducing total publication costs than other steps.
 - An assumption that there will not be undesirable distributional effects on publication rates of researchers in less developed countries, or researchers at different stages in their careers, or researchers in different types of institutions, or that any effects can be mitigated.
 - An assumption that a single model will work for all disciplines. This is true not only in considering social sciences and humanities) but within STEM sciences, where there are differences in funding models.
 - An assumption that other undesirable effects – on Learned Societies for example – are either unimportant, or can be met by other funding models.
11. For all these questions, empirical evidence ought to be important. The failure to present evidence about the proposed implementation plan or the need for the accelerated timetable is of concern to the Academy of Social Science, and it is to that issue that we devote much of the rest of this submission.

Some general evidence

12. Many high quality journals are hybrids of 'pay to read' and 'pay to publish' models. This includes many science journals (*Nature*, *Science*) as well as many social science journals. These include journals that contribute to many social science Learned Societies, such as the Royal Economic Society, the Royal Statistical Society and others. Many of these journals have international reach, both publishing from authors across the world, and with international subscriptions.

13. Looking at total publications, there are some estimates that about 20% of all newly-published articles are currently published as open access, though a lower percentage will of course be published in journals that are wholly open access and therefore compliant with Plan S. There is little accumulated evidence about how these proportions are distributed between different disciplines and fields, much less any linking this to any quality measures or citations.
14. The Academy of Social Sciences has collected recent evidence from a small number of our Learned Society members, covering several of our larger Learned Societies. Some of these had more than one journal, and some had both hybrid journals and full open access journals. When asked, these Learned Societies reported an average of less than 10% of articles published in the latest year for which figures are available in full 'Gold' open access compliant form, though the range (depending on the journal) was from 2-20%. Estimates of the proportion of articles funded by current cOAlition S funders ranged from 3% to 35%, with an average (across a small sample) of less than 20%. These figures suggest that the social sciences may be different from those cited by *Science*, but it is a difference of degree, rather than kind.
15. All this suggests that the ambitions of Plan S for most journals to be funded by article processing charges would, if realised, be an enormous transformation. This will be more complicated by the fact that Plan S seems to depend on different national partners and funders to 'implement' it in their own way. There are for instance statements that China is supporting Plan S, but no detail about what this support means. In Germany, Wiley has reached an arrangement that funds publication but on a collective basis rather than through article processing charges, and there seems to be a view that, given the situation in Germany, with its constitutional protections for academic freedom, this will be compliant with Plan S. In the United States, there are fewer centralised funders in the social sciences, and this may mean that researchers in different countries have different abilities to choose publication vehicles. **The allowance of different national implementation strategies reduces the chance of a quick and simple transformational leverage by cOAlition S funders.**
16. In the UK, UKRI seems to be planning a broader definition so that any research produced with 'public funding' (presumably not just in receipt of research funding from cOAlition S funders but in receipt of QR funding, or possibly any public funds via universities) would be required to publish in Gold Access journals.
17. If APCs were to be supported by QR in the UK, this would raise questions about the additional money needed if publishing volumes were to be maintained. Moreover, it raises questions about how such funds would be distributed. Would universities allocate them? How would they handle APCs for new-career researchers (who might change institutions before the next REF submission?) Would they allocate funds to emeritus or other retired professors who are still actively publishing? How would they allocate funds between disciplines? Would all requests for APCs be met if the new system incentivised growth in publishing volumes? What about universities who receive

little QR funding, but where researchers producing excellent research can currently publish their work? As [Professor Peter Mandler of Cambridge University](#) has said, 'policymakers find it easier to make policy than to find the funds to back it up'. We return to this issue below.

Learned Societies

18. One of the issues of greatest concern to many in social sciences is the role of the Learned Societies in supporting the long-term health and well-being of social science disciplines and what the effect of the stance on hybrid journals may mean for them.
19. Most of our social science Learned Society members have one or more journals. Some of these are full ('Gold') open access but most are 'hybrid' journals, dependent on a mix of subscription charges and article processing charges for articles funded by researchers who are required (and have funding) to publish as immediate open access, usually with article processing charges. Many of these journals are not funded by the large commercial publishers, but by smaller publishers with lower margins; in the case of many high status, high impact, high citation journals, much of the subscription income comes from other countries. Many of these journals have high numbers of submitted articles, and exercise a stringent control of 'quality' rather than seeking to maximise income by publishing larger numbers of articles; the Learned Societies play an important role in helping ensure peer review takes place. The article processing charges for articles accepted in these journals are higher than they may be in less-selective journals in order to cover the costs of the large number of submitted articles that are rejected.
20. The revenues from journal publication are important to the health and autonomy of the Learned Societies, though there is wide range in estimates of the proportion of total income they derive from journal publication (which illustrates the diversity and heterogeneity of the Learned Societies, even within the social sciences). From work the AcSS commissioned, with ESRC funding, in 2012-13, Professor Robert Dingwall and colleagues showed that publishing revenue accounted for between 5% and 65% of revenue of the social science Learned Societies covered (40 out of the 44 active in the social sciences). Larger Learned Societies with significant income from practitioner licensing or where Learned Society membership is more or less required, or those that can generate significant income from non-academic training are, in the main, less dependent on publishing income. We understand that Professor Dingwall has information about a range of Learned Societies across all disciplines, funded by Universities UK, and this may give some up-to-date information, as well as comparisons with Learned Societies in other disciplines.
21. Our own recent information from a small number of Learned Societies, representing many of the core social science disciplines with large numbers of members, shows that publishing represents between 40-50% of their revenue, though it ranges from 20-70%. Most report too that they have worked hard to ensure all their journals have an open access option, that article processing charges typically average around £2000. Most Learned Societies are constrained in the other income they can raise, especially from subscription income. They have constrained memberships, mainly academics on

academic salaries, and cannot easily raise membership fees to cover the loss of publishing income. While we welcome the partnership between the Wellcome Trust, UKRI and the Association of Learned and Professional Society Publishers (ALPSP) in commissioning Information Power to explore strategies and business models through which Learned Societies could transition to Plan S, we believe that this enquiry should produce evidence for wider discussion *before* an implementation strategy is set in stone.

22. Learned Societies make an important contribution to the functioning of disciplines and research communities, including ensuring their research communities contribute to current government research agendas. They are increasingly engaged in working with practitioners, professional users and the wider public. They develop teaching materials and resources, including in many cases for school-level qualifications and teaching. They convene international conferences and seminars, outside the conferences they hold as services to their own members. Many subsidise conference participation for new researchers or academic staff, or for those from less-developed countries. Many subsidise publication costs for these same group of less-established authors. Many make small grants to new researchers or international researchers. Many of the larger ones have policy roles, providing advice, support and critique for public policies related to their disciplines. (For instance, on national statistical series and other statistical matters in the case of the Royal Statistical Society; on educational policy and practice in the case of some of the Learned Societies related to education; on regional development matters and global development in the case of the Regional Studies Association; and so on.) Some fund post-graduate or post-doctoral work for new researchers in their disciplines. Many help ensure that policy-relevant research is disseminated directly to policy-makers, more quickly and in a form more suitable than academic articles. Some publishers working with particular disciplines provide additional funds for these purposes. All of these activities support diversity and pluralism and ensure that there is not a single funding stream for supporting research. Again, we have further detailed evidence that we would be happy to provide.

Implications

23. With the great heterogeneity of Learned Societies, and the journals they are responsible for, it is not surprising that there are concerns that Plan S, as currently formulated with its one-size-fits-all approach to widening open access, has stimulated disquiet. The social science disciplines we represent are not the only ones concerned about the lack of evidence in Plan S and its implementation guidance.
24. One important set of reasons is a concern about possible unintended consequences that Plan S has not addressed.
25. First, is a concern that the proposal will not recognise the funding realities in different disciplines. With so much social science research unfunded by external grants, and the wide definition UKRI is proposing to mandate publication in journals that are wholly open access with no hybrids charging subscriptions, this could transform UK publishing

in a number of undesirable ways. Some social science journals have claimed that, as they are already highly-selective, they may simply publish few articles by UK authors, and primarily publish research by international authors, including North America, or research from those in other countries whose participation in Plan S is implemented in different ways. Indeed, there are concerns that international research collaborations with some key countries (including the United States) may actually be reduced. Others are concerned that, with a likely short-fall in funding unless considerable new funding for article processing charges is made available, the volume of social science publications will decline, at a time when other structural processes (such as the REF) bring serious consequences to those who do not publish. There is simply not enough evidence, or detail in the information put forward to know if these issues have been considered.

26. A second set of concerns revolves around the possible effects on the quality of published research, and the efficiency of judging quality in a system that gives direct incentives for volume of publications. Whereas our Learned Society members do not plan to change their attention to peer review or selectivity of publication, other publishers may do just that. Indeed, there has been some speculation that it is possible that large volume commercial publishers may come to have an even larger role in academic publishing, as they have economies of scale that may make journals funded only by article processing charges viable, and incentivise growth in the number of published articles irrespective of quality. Any of these developments could make finding and judging the quality of published research more inefficient.
27. Third, there are a range of questions about sudden alterations in the distribution of publishing resources under the transformation being proposed by Plan S. Questions have been raised about whether those working in less wealthy countries will in fact be able to pay article processing charges, so that current difficulties in supporting access to read under the subscription charging model may be replaced by difficulties in being published.
28. There are other distributional issues (across career stages, disciplines, institutions and global location) relating to funding, as we have raised above. Funding is not, however, the only issue that matters. There have been many reactions to Plan S which stress the importance of academic freedom as a general principle, with the specific choice of where to publish being an example of freedom for individual academics. **There has been relatively little discussion about the importance of continuing to have different streams of funding that support academic autonomy.** Diversity in funding sources and the degree of pluralism this brings helps underpin the autonomy and independence of the learned societies in particular but of individual academics as well.
29. We have raised concerns about how APCs would be made available and allocated in the UK. But we are also concerned about how to ensure that Learned Societies can continue to thrive. In the UK, UKRI has suggested that it might consider funding Learned Societies directly, rather than allow hybrid-publishing models to continue to be available to any researcher in receipt of public funding. It could of course simply fund

APCs. But direct government funding of Learned Societies carries risks, related not only to the quantum of funding, but to Learned Society autonomy. Currently, Learned Societies are free to take their own views about activities that support their disciplines and research communities, especially over the longer term. Central funding of Learned Societies by government would reduce that autonomy.

30. There are other elements in Plan S that cause concern. These include the issue of what to do about monographs, to be considered on a somewhat longer timetable, but which will certainly be even more complex than open access journals. Crucially, it also includes the issue of the CC-BY licensing requirement, rather than a CC-BY ND licence, to ensure that text cannot be lifted, or even altered, without regard to surrounding argument or text, without clear citation of what changes have been made. This is essential to all of our members. Without it, simple CC-BY licensing could actually impede open access to accurate information.

Conclusion

31. The AcSS remains a supporter of furthering open access. While most observers agree that progress has made, with most estimates agreeing that open access articles have doubled in the past decade, we understand the desire to speed up progress. We also understand concern over publication costs, not only as a barrier to dissemination and access, but also as a drain on public resources which could be used elsewhere. But there are risks too in the method of implementation Plan S envisages, and in the speed with which it aims to produce change. Evaluating these risks requires evidence and public discussion.
32. We think cOAlition S, and within the UK, UKRI, should take an evidence-based approach that considers how to promote greater openness that works for all disciplines. We share the cautionary concerns of ALLEA, the European Federation of Academies of Sciences and Humanities. Engaging with the evidence will take time, but the evidence should be considered before the proposed implementation strategy and its timetable are put into effect. This need not lack a sense of urgency, but it would ensure there was more detailed empirical evidence than is available now to consider the consequences – the advantages and disadvantages – of the implementation proposals of Plan S.