



**THE ENGLISH
ASSOCIATION**



A joint response by the English Association and University English to Plan S.

The English Association was founded in 1906 with the aim of fostering knowledge, understanding and the enjoyment of the English language and its literatures, as well as good practice in teaching and learning at every level. It was granted a Royal Charter in 2006. The Association has 293 Fellows, senior figures who have made a distinguished contribution to the study of English, whether through their research, pedagogy, creative practice or work as publishers. The Society publishes the hybrid journal *English* with Oxford University Press.

Founded in 1993, University English (formerly CCUE) is the main professional body representing the interests of English studies as a whole within UK Higher Education: including research and teaching of English language, literature and creative writing. We work in consultation with funding bodies and other agencies on policy matters. Membership is by departmental subscription, and as a result of our policy of active consultation with our members, we are able to give an authoritative representation of views within the discipline. University English does not publish a journal.

In formulating our response we have also consulted with the Chair and Higher Education Committee of the National Association of Writers in Education, who have endorsed its contents.

This joint response focuses on the main recommendation of Plan S that **'After 1 January 2020 scientific publications on the results from research funded by public grants provided by national and European research councils and funding bodies must be published in compliant Open Access journals or on compliant Open Access platforms'** in relation to (a) journals, and (b) monographs and other books. We respond to the recommendations on licenses, which apply to both forms of publication, at the end of this document.

The English Association and University English are committed to the public dissemination of all research, and have consistently taken positions in support of OA as a principle. This needs to be emphasised: we support OA. However, we also believe that peer-reviewed and (fairly paid) copy-edited research should be published at no cost to individual authors. We welcome the recognition in Plan S that repositories and open archives need to have a long-term archiving and curation function. We also welcome the prominence given to DORA in Plan S as its robust stance against the use of proxy metrics reflects our own belief that peer-review is the only reliable way to assess research quality.

However, despite agreeing on all of these points, like other Humanities disciplines we write in defence of hybrid journals and their contribution to the ecology of our discipline. Moreover we are concerned that the place of books in Plan S appears to be an afterthought, given that the majority of the research outputs in English studies are monographs or other books: in the last UK Research Excellence Framework a third of outputs submitted in English were articles, a third were book chapters, and a third were books (monographs, scholarly editions, creative writing). Finally we are disappointed that there is no reference to the challenges posed to OA policies by creative writing, despite the fact that the need for exemptions for certain categories of output is now well-established in UK research policies.

Journals, learned societies and funding for the humanities

At the heart of our defence of the role of the hybrid journal (and Green Open access with a period of embargo) is dismay at the poor funding of the Humanities, and the lack of understanding of the role that learned societies play in trying to plug the shortfall. This, more than anything, should be addressed alongside a push for more OA. (The repeated mantra that learned societies should change their business models is inappropriate without a considered rethinking of the funding landscape for the Humanities.) More strongly, we would argue that the current arrangement is a STEM problem that is being allowed to drive a one size fits all programme that pays no attention at all to funding realities and inequities.

We argue that the insistence on immediate compliance for funded research is inappropriate and dogmatic and shows a lack of understanding of the current funding situation for research in the Humanities, and of the significant role played by learned societies.

In the UK, our main Research Council, the AHRC, currently receives only 2.8% of the budget of the EPSRC. This is despite the fact that heritage tourism generates ca £30 bn p/a while the creative industries are worth over £90 bn p/a; these areas are supported directly and indirectly by the research that we do and the people that we teach and train. (And we know from agencies like NESTA (2017), that the humanities are essential for future economic growth: <https://www.nesta.org.uk/report/the-future-of-skills-employment-in-2030/>.) The majority of our research is funded through the diminishing block grants determined by the REF exercise (QR funding), or – in the case of ECAs ('the precariat'), independent scholars and emeriti – personal income. We understand that QR funding is public money, and thus, although it is not stated explicitly in the Plan S document, it will inevitably be included in the cOAlition S/UKRI proposal. We would like to hear about the research that cOAlition S/UKRI have undertaken to ensure a fair distribution of funds so that all arts and humanities researchers - 30% of the UK's research body - can aspire to publish where they wish not where they can afford, including in journals of international standing in countries where there is no OA mandate. There is currently little money available for Gold OA in our disciplines, with the exception of some charitable funders. If the result of Plan S were to be a move towards APC-funded publication, we believe this would divert a substantial amount of money from research to dissemination, for only marginal benefit.

This is why we argue that until there is better distribution of public funds that takes account of the Humanities, the current hybrid model, alongside existing and future OA journals that

authors can already choose to publish their work in, 'best' protects the Humanities. UKRI-/QR-funded research should appear alongside self-funded work in the our journals.

In 2018, just as in 2012, there has been no serious attempt to recognise the work of learned societies in the Humanities or the business models they have developed. Learned societies of all sizes, with and without journal income, depend on the work of volunteers to offer mentoring schemes, networking opportunities, events and conferences as well as to reflect on, consult and respond to national challenges. Learned societies have been urged by cOAlition S to get on board with their plans. We invite cOAlition S to engage with our communities, both to understand the role of learned societies in the Humanities, and to join us in arguing for more public funding for Humanities research. We recognize that latterly the Wellcome Trust is offering advice on different business models for OA (e.g. <https://wellcome.ac.uk/sites/default/files/developing-effective-market-for-open-access-article-processing-charges-mar14.pdf>) but again there is little attention to the different funding model of the Humanities. What one can learn from the advice here is an acknowledgement that the problem lies with STEM (it is recognized, for instance, that APCs for Humanities journals are much lower, and that a post-Finch UK government Select Committee advised different embargo periods for Humanities, 12 months, and STEM, 6 months).

We do not think it is in the interests of the research community we represent that journals and societies should be obliged to choose between compliance with the principles of the current Plan S and non-compliance, between those who are funded by public grants and those who are not, between those who can afford to pay APCs, and those who cannot.

We would draw the attention of cOAlition S to the following additional points:

- i. The subscription rates of humanities journals, as noted above, are modest, and not at all comparable to those of STEM journals published via the large publishing conglomerates. Profits shared with the learned societies are used to support the host of activities described above, compensating for lack of funding from other sources.
- ii. Many of us value our relationship with our publishers, who provide a professional service that we cannot: including copy-editing, high-quality print-publication and the maintenance of a platform that ensures a fair process of anonymous, rigorous, fully transparent peer review. These journals offer important, well-recognised venues for the work of scholars regardless of their stage of career or their ability to pay APCs. (Plan S acknowledges robust systems for OA are needed. Such systems, which carry a cost, are not in place yet, as various well-known OA spoof publications have exposed.)
- iii. Plan S envisages a flat landscape of publications in which longstanding and storied journals are equated with other types of 'platform' for delivery of content, and sees no loss in restriction of the publication venues available to researchers if their preferred journal is non-compliant with Plan S principles. We argue that in targeting particular journals, scholars in the Humanities are not engaged in reputation-seeking but aiming to contribute to specific traditions of

enquiry. Discoverability and visibility of research to international communities of scholars is currently complexly embedded with journal identities. Plan S threatens to drive a wedge between UK Humanities researchers and some of these international publishing venues, but takes no account of the loss this entails. We know that there are similar worries in STEM fields where journals may reflect extremely specific methodologies or techniques so do not believe this is special pleading.

Monographs and other books in the humanities

The 2015 Crossick report on Monographs and Open Access established clearly the extent to which, and the reasons why, monographs and scholarly editions are central to Humanities disciplines such as English. Significant works can take 10 years or longer to produce, and represent a huge personal investment from authors. Very often, the expertise of established publishers is critical to the final form of a book, and to its longevity: some scholarly works of which may define a field for a generation or more; but equally, many researchers in the Humanities write books for trade publishers which already find a large public audience.

Although Plan S allows that it may take longer to implement its principles for books than for articles, we believe this critically underestimates the differences between these two forms of publication, and the significance of these differences for scholarly practice in the Humanities.

This is not simply a matter of time, although we note that there currently exists no established model of OA book publishing at scale that might realistically replicate the work of commercial and scholarly academic presses; nor has there been any concrete proposal as to where the estimated £19.2 million p/a required in the UK to support OA books might come from (Eve et. al. 'Cost Estimates of an Open Access mandate': <http://doi.org/10.1629/uksg.392>). Indeed, we are aware of real and widespread concerns within the subject about the uneven distribution of access to APCs for books and the degree to which publication would come to depend on ability to pay rather than the quality, thus undermining confidence in the published outputs of research. We are extremely worried that differences between institutional resources to pay OA costs, or competition for scarce funding, are likely to increase inequalities between institutions and categories of staff.

It is rather, a matter of principle. As the lifetime and relevance of humanities research can often be measured in decades, we do not believe, for example, that embargo periods of 12-24 months would represent an unsupportable restriction on the public accessibility of research, if these are necessary to protect commercial publishing and to avoid funding that would otherwise go to the research process being diverted to APCs. Much more so than for journals we believe there is a conflict between the principle of accessibility and that of discoverability, and that the established routes to market via trade and commercial publishers contribute to making the results of scholarly research more, rather than less accessible. We also believe that there is a compelling case for exemptions for certain categories of book, including fiction and poetry. There is a discussion to be had, and consultation between UKRI and researchers via their learned societies and subject

associations is critical. Yet in becoming a signatory of Plan S without consultation, UKRI seem to be committing to an accelerated and deliberately 'disruptive' transformation of Humanities research which we believe is, despite chronic under-funding, a major UK success story. In doing so, UKRI have undermined our confidence in the ongoing consultation processes within the UK on OA monographs, in particular on the crucial unresolved question of where the funding for OA books will come from.

Plan S mandates that publicly funded research must be published under the most permissive CC BY licence, which allows for reuse and adaptation of any kind, provided that the original author is acknowledged.

Most humanities journals ask authors to sign the CC-BY licenses with the non-derivatives clause. To replace this with the most permissive license that allows for re-use and adaptation of any kind, provided the original author is acknowledged, is not acceptable to the majority of Humanities scholars, where the line between raw data and its argued presentation is much harder to draw. The current license offers protection against uses of our work that are regarded by many in our community as unethical (plagiarism).

Third-party rights are a problem with the more permissive license: there is a lack of consistency in the permissions policies of archives and galleries for the reproduction of non-text sources. Publication rights are normally time-limited (for example, three to five years); renewal of rights can be costly and burdensome for OA work, or permissions given only for poorer quality reproduction.

Jennifer Richards, Chair of The English Association's HE Committee
Alex Thomson, Chair of University English

February 2019