

Open Access and the REF

A British Academy position paper

July 2024

This document offers a complete statement of the British Academy's views on open access and the REF (Research Excellence Framework).

Parts II and III contain the text of submissions already made to the UK higher education funding bodies in response to the REF 2029 Open Access consultation.

Parts IV and V contain new text, providing additional arguments and evidence, and recommendations for future dialogue.

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PART I

Background and overview of principles

How we have got here

- 1 In the last dozen years, open access has become an increasingly important feature of academic dissemination, its evolution associated with developments both technical and in terms of funder policy.¹
- 2 After a major consultation in 2020, UK Research and Innovation (UKRI) introduced in 2021 some significant policy developments to promote open access for both research articles and longform publications, but these only related to outputs from work supported by the UK Research Councils. It was recognised at the time that the open access policy that might be introduced for the 'REF-after-REF 2021' would apply to a much larger number of outputs, particularly in the SHAPE (Social Sciences, Humanities and the Arts for People and the Economy) disciplines, and a separate consultation on this was promised.²
- 3 The REF 2029 Open Access Consultation opened on 18 March 2024, with a deadline for submissions of 17 June 2024. The British Academy submitted its own response on 14 June (included in this paper as Part III), and on 18 June also sent a covering letter to the executive heads of the four UK higher education (HE) funding bodies (included as Part II).³

The British Academy and open access

- 4 The British Academy engages with open access through its different roles as a funder of research, as an academic publisher, and as a voice for the SHAPE disciplines on HE policy matters.⁴ The combination of these roles provides the Academy with a unique perspective on open access matters.

¹ Open access has been a matter of serious policy debate in the UK since the publication in 2012 of the 'Finch Report' (*Accessibility, sustainability, excellence: how to expand access to research publications. Report of the Working Group on Expanding Access to Published Research Findings*, chaired by Dame Janet Finch).

² The '[UKRI Open Access Review: Consultation](#)' document (2020) included 'high-level questions to help inform the development of the OA policy for research outputs submitted to the UK-wide Research Excellence Framework (REF) exercise following REF 2021 (REF-after-REF 2021)', in order to help determine the appropriate 'commonality' between the two policies. 'Informed by the outcomes of UKRI's review, the UK HE funding bodies will launch a detailed REF-specific OA consultation ..., which will inform their decisions on the OA policy for the REF-after-REF 2021.' The British Academy's response to the 2020 UKRI OA consultation can be found at <https://www.thebritishacademy.ac.uk/publications/british-academy-responds-ukri-open-access-review-consultation/>

³ The texts of these can also be found at <https://www.thebritishacademy.ac.uk/publications/british-academy-responds-research-excellence-framework-2029-open-access-consultation/>

⁴ In the British Academy's [Strategic Plan 2023-2027](#), under Objective 1 'To invest in the very best researchers and research', a specific delivery aim is to 'Respond to evolving trends in the academic publishing landscape, and lead on new initiatives for supporting the dissemination of research, including open access'. An overview of the British Academy's engagement with OA can be found at <https://www.thebritishacademy.ac.uk/programmes/open-access/>

- 5 As a funder, the Academy does not have the additional resources it would need to be able to support its award holders to pay fees ('processing charges') to publishers for 'Gold open access' (see para 10 below).⁵ Because the Academy believes that open access should not be imposed unless it can be properly funded, and because it prioritises funding new research, it does not currently stipulate that any output from an Academy research award must be made available in an open access format.
- 6 However, we are committed to enabling open access where we have the resources to do so. As a publisher, our *Journal of the British Academy*, and our series of *British Academy Monographs* by Academy-supported ECRs,⁶ are both fully open access, funded through the Academy's own resources (i.e. the 'Diamond open access' model). A greater proportion of our publishing programme would be open access if we had the funding to make it so.
- 7 As a policy voice, the Academy is regularly consulted by, and collaborates with, funding and policy-making bodies. We have contributed consistently to all the policy debates on open access that have taken place in the last dozen years.⁷ We have also consistently demonstrated an interest in exploring different open access models: for example, we are currently partnering with UKRI in a project to help learned society and subject association book publishers transition to sustainable open access models (SPA OPS 4.0).⁸
- 8 Finally, we play a convening role to promote dialogue on these issues across sectors and stakeholders. Through the Strategic Forums for the Humanities and the Social Sciences, and through our Learned Societies and Subject Associations Network (LSSAN), we have been able to gather a range of views on open access in recent months.⁹ In addition, our work on open access is steered by an Open Access Advisory Group, which draws on expertise from within the Academy's Fellowship and beyond. All this has informed our response to the REF 2029 Open Access consultation.

⁵ For example, the maximum award for one of the popular British Academy Small Research Grants is £10,000. As a rough average, half of all Small Research Grants lead to an academic book. Because a typical 'book processing charge' (BPC) could be equivalent to the whole value of the original research grant, if the Academy allowed such an open access charge to be applied for as an additional eligible cost, it would dramatically reduce the total number of grants that could be awarded under this scheme.

⁶ We know from the evidence of our series how important a monograph can be as a stepping stone in an ECR's career in many SHAPE disciplines, helping them to secure a first academic post. It is therefore important that any open access policies do not inhibit ECRs from publishing that career-establishing work – see Part IV, paras 13-14.

⁷ For example, through our 2019 report on *Open Access and Book Chapters*, we helped with the definitions of output types in UKRI's open access policy; and our response to the 2020 UKRI consultation helped further refine definitions of output types that are out of scope. It is therefore particularly frustrating that these particular points have been overlooked in the proposed REF open access policies.

⁸ [Open Access transitions for book publishers \(SPA OPS 4.0\)](#).

⁹ In October 2023, we hosted a 'mini-forum' on open access for the Strategic Forums for the Humanities and Societies. In November 2023, we gathered evidence from LSSAN members on the impact of open access on their publishing and other activities. And in May 2024, we hosted a meeting at which representatives of Research England discussed the REF 2029 Open Access Consultation with LSSAN members.

Principles and overview of the British Academy's response

- 9 The British Academy has long supported the principle of open access, recognising the valuable role it can play in broadening the readership of academic publications.¹⁰
- 10 But where an output has been made 'free to read', it does not mean that it was 'free to publish': formal publication of a version of record¹¹ carries an unavoidable cost that must be met somehow. The most developed open access models involve (a) the publisher being paid to make the version of record free to read, through processing charges paid by the author or their institution ('Gold open access') or through 'Read & Publish' deals;¹² or (b) the publisher retaining the ability to exploit commercially the version of record, and it is only the 'author's accepted manuscript' version¹³ of an output that is made free to read, after an initial embargo period (insofar as permitted by funder stipulations) ('Green open access').
- 11 Because open access comes with costs that need to be met,¹⁴ the Academy has always maintained that the delivery of open access must be financially sustainable for the long term, and that any open access policy stipulations by funders should not jeopardise the academic dissemination ecosystem.
- 12 In our responses to consultations on open access stretching back over the last decade and more, we have consistently argued for three key principles that we believe should guide future developments in this area:
- any system seeking to promote open access should be sustainable and should not damage the publishing and research ecosystem;
 - any proposals should reinforce and not undermine research excellence; and
 - any proposals should consider the impact of what is proposed on the career structures of researchers in SHAPE disciplines and should not disadvantage early career researchers (ECRs) or those at less well-resourced institutions (or not at an institution at all).
- 13 The proposals laid out in the consultation on open access and the REF have raised a number of important issues about the best way to secure a long-term future for open access that is fair, responsible and sustainable, while still supporting SHAPE disciplines in the university sector. The Academy has addressed these issues in detail in its response to the consultation, while also publishing an open letter calling on the HE

¹⁰ The British Academy also supports the principle of open research, but this is not the same as open access. Academic dissemination in the SHAPE disciplines has a particular emphasis on the exact form in which the research is published (i.e. as a journal article or longform output), rather than on making available underlying research data. So the impact of open access policies on the creation and dissemination of these specific published outputs is of critical importance.

¹¹ The 'version of record' is the final peer-reviewed, copy-edited and typeset version of a published research output, typically available via the publisher's own website.

¹² For a definition of 'Read & Publish' agreements, see Hinchcliffe, L.J. (2019), '[Transformative Agreements: A Primer](#)', *The Scholarly Kitchen*.

¹³ The 'author's accepted manuscript' is the version of a research output submitted by an author that has been through a peer-review process and accepted for publication, but has not yet been copy-edited or typeset, typically made available via an institutional or centrally organised subject repository.

¹⁴ Open access also brings with it costs for higher education institutions, for repositories for the Green open access model, and simply for the administration of funders' policies – which will be all the greater if burdensome stipulations are extended to longform outputs for the REF (see Part III, Q12, and Part IV, para 16).

funding bodies to pause the proposals pending a more thorough exploration and analysis of the potential impact of the proposals on the research and publishing ecosystems, especially for the SHAPE disciplines.

- 14 We have argued that this is a matter of particular importance at a time when university budgets are under threat and many arts, humanities and social science departments are threatened with closure.
- 15 Our responses to the specific issues raised by the REF 2029 Open Access Consultation are summarised in [Part II](#) of this paper (which provides the letter sent to the leaders of the UK's four HE funding bodies), and laid out in detail in [Part III](#) (which provides the full copy of our response to the consultation).
- 16 In [Part IV](#), we expand on some of those responses, offering additional arguments and evidence that should be taken account of in the formulation of any open access policy for REF 2029.
- 17 Finally, because we believe in the overall benefits of open access in broadening the readership of academic publications, in [Part V](#) we conclude with a call for new thinking and collaborative dialogue on better ways to achieve sustainable open access in the long term.

PART II

Letter to the executive heads of the four UK higher education funding bodies

18 June 2024

Dear Executive Chair, Chief Executives and Director,

This week we, the British Academy, have submitted our response to the REF 2029 Open Access Consultation.

Given the constraints of the format in which you have called for responses, we felt it important to send a supplementary letter to stress at a fundamental level our concern about the proposals and to warn of the significant likely consequences for the health of research in the UK were they to be implemented.

The British Academy, the national academy for the humanities and social sciences, is a strong supporter of the principles underpinning open access. We believe that the valuable knowledge and insights generated by research should be available as widely as possible.

However, we have long made the point that any system that enables greater access to research needs to be fair, responsible and sustainable. It should not impact negatively on those who produce the research, on the quality and excellence of their work, on the environment in which they operate or the research and publishing ecosystems more broadly.

We believe that the open access proposals for REF 2029 could jeopardise all of the above, and have particularly damaging consequences for researchers in the arts, humanities and social sciences, for whom longform outputs are an important mode of publication. In particular we fear it will distort and restrict the publishing options available for researchers, and be particularly damaging for those early on in their career. We are concerned that the proposals could undermine precisely those standards of excellence in research that the REF is designed to encourage. We also fear the proposals will further exacerbate the funding crisis for universities, a crisis which is leading to actions being taken which are impacting hardest on arts, humanities and social science subjects.

We have outlined our views in full in the consultation response, including:

- The need for any system of open access to be properly funded
- The need for a full impact assessment of the proposed changes, including a detailed analysis of the proposed open access requirements for longform outputs on the likely behaviours of all involved, including universities, authors, publishers and libraries
- The need to ensure that research integrity/excellence is protected
- The need to ensure the system promotes inclusivity, not exclusivity, and ensures the principles of a positive research culture and environment are maintained.

We would urge you to consider the concerns that we and others in the sector have highlighted and to pause the introduction of these proposals in order that further analysis and modelling can be carried out, including a full impact assessment.

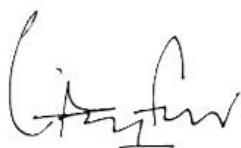
We stand ready to work with you and your colleagues on a way forward and would welcome the opportunity to convene discussions – across funders, libraries, HEIs and publishers – to identify collaborative and more effectively resourced models for supporting a fair, responsible and sustainable open access regime.

Yours sincerely



Professor Julia Black CBE PBA
President

AND



Professor Lindsay Farmer FBA
Vice-President (Publishing)

AND



Professor Simon Swain FBA
Vice-President (Research and Higher Education Policy)

PART III

REF 2029 Open Access Consultation: Response by the British Academy

14 June 2024

Section A: open access developments in the sector

4. What are the most important changes in the open access landscape since the development of the REF 2021 open access policy? 1) How do these differ across disciplinary areas? 2) What are the implications of these changes for the REF 2029 open access policy?

OA landscape changes:

The British Academy is committed to the responsible and sustainable use of Open Access (OA) - we publish an OA journal, and OA monographs by early career researchers (ECRs). OA delivery must be sustainable, support research excellence, and must not jeopardise the research and dissemination ecosystem for the SHAPE (Social Sciences, Humanities and the Arts for People and the Economy) disciplines, nor disadvantage those who may not have access to OA resources (e.g. ECRs). We are concerned that these proposals will damage that ecosystem, promote exclusivity, and undermine research excellence. The higher education (HE) funding bodies should not proceed until further research/modelling has been done on the potential implications.

More SHAPE articles are now available OA - largely made possible by Jisc transitional agreements - but the REF policy should not assume that OA for SHAPE is consistent with excellence or the ecosystem's sustainability. A 2023 British Academy survey of SHAPE learned societies revealed pressures from Read & Publish deals to publish more articles in their journals, threatening academic integrity/quality. There is also uncertainty about what financial arrangements for OA will follow the transitional agreements (which for learned societies throws doubt on their future ability to conduct charitable research, engagement and educational activities, currently funded by journal income).¹⁵

Longform outputs are a key medium for SHAPE disciplines (in REF 2021, 45.7% of Main Panel D submissions, 13% for Main Panel C), but the funding and infrastructure for OA publishing is underdeveloped. While the UKRI books policy provides additional funding for OA publication of the version of record (VoR), the REF policy, which would apply to many more outputs, does not. In the current climate it would be disingenuous of the HE funding bodies to expect existing quality-related (QR) funding to be used by

¹⁵ A more detailed discussion of the current OA landscape for journals, in particular in respect of journals published by SHAPE learned societies, is provided in Part IV, section (a).

HE institutions (HEIs) for that purpose.¹⁶ If the default OA compliance policy is to be based on the author's accepted manuscript (AAM) version, neither the utility of the AAM (for researchers or for the public) nor the true costs of administering this for the HEI sector have been demonstrated. And there has been no impact assessment of how an OA AAM policy might affect the behaviour of libraries or publishers.¹⁷

It remains unclear whether the proposed changes would support research excellence or undermine it. This alone should give the HE funding councils pause. We strongly argue that any proposed changes should not be implemented until a full impact assessment has been conducted and proper support measures are in place.

We support discussions - across funders, libraries, HEIs, and publishers - to identify collaborative and more effectively resourced models for supporting OA. These will take time, and will not deliver resource models for this REF cycle. The British Academy is willing to play any role it can in facilitating such an important dialogue.

Section B: journal articles and conference proceedings

Section B: publication, deposit

5. Should deposit requirements post acceptance be maintained where publication isn't immediately open access?

Yes / **No** / Not sure / No comment

If yes, why? What would be an appropriate time limit for deposit post acceptance?

Section B: access, licensing

6. Do you agree with alignment to the UKRI open access policy in respect of licensing for journal publications by requiring licensing terms equivalent to CC-BY or CC-BY-ND licensing for journal publications?

Yes / **No** / Not sure / No comment

What, if any, negative or positive impacts might there be from this change?

We welcome the proposal that NoDerivatives (-ND) will remain an allowable element in the Creative Commons licence for a journal article. The British Academy has consistently argued that only a CC BY-ND licence protects text from distortion by subsequent users, and that this is an important requirement for the integrity of academic argument in a number of SHAPE disciplines.

However, while we understand the motivation to promote barrier-free access to journal article content, we have considerable concerns about the proposed removal of a NonCommercial (-NC) option from the licence. This would allow unrestricted reproduction of content by predatory publishers in inappropriate contexts without

¹⁶ A more detailed discussion of the broader context for HEIs, and of the likelihood that QR funding might play a role in supporting OA, is provided in Part IV, section (c).

¹⁷ A more detailed discussion of the current OA landscape for longform outputs, including the implications of a REF OA policy based on the AAM, is provided in Part IV, section (b).

author consent, and that in turn could risk undermining the future financial footing of the original journals (see also Q8). Further, it would also allow unregulated exploitation of content to train AI large language models; and in a most unhealthy loop, this has already led to a proliferation of AI-generated articles, which are of poor quality, yet nevertheless can overload journal editorial resources. We therefore believe that -NC should be retained as an allowable element in licences for journal articles, as was the case for REF 2021, and as is now proposed for longform outputs.

Section B: pre-prints, alternative platforms

7. Do you agree with recognition of alternative platforms as meeting open access requirements as primary platform for publication?

Yes / No / **Not sure** / No comment

Please provide any further comment

In some SHAPE disciplines, pre-prints (or 'working papers') have some currency (e.g. in economics) for developing ideas; in other SHAPE disciplines, where the text as peer-reviewed and finally approved for publication is all-important, pre-prints are quite alien.

Using 'alternative publication platforms' as additional paths for meeting OA requirements might seem unobjectionable. But if a pre-print posted to an alternative platform has to be equivalent in content to a VoR or AAM, that undermines the value of keeping pre-prints as an eligible output. And alternative platforms should only be a complement to (not a substitute for) traditional publishing modes. In a world where many shadow or echo versions of an article may proliferate, the journal VoR is crucial for protecting the integrity and excellence of the scholarly record.

Section B: embargo periods

8. Do you agree with the proposed changes to embargo periods for journal publications for main panels A and B (12 months reduced to six months) and main panels C and D (24 months reduced to 12 months), in light of changing standards and practice?

Yes / **No** / Not sure / No comment

What, if any, negative or positive impacts might there be from this change?

We welcome the continued recognition of disciplinary differences, which allows for a longer embargo period for SHAPE disciplines than for STEM ones. And we welcome the fact that the proposed REF policy here is not the same as the UKRI policy (which does not permit any embargo periods at all for journal articles). We recognise that, with OA journal publication currently supported by Jisc transitional agreements, a reduction of the embargo period from 24 months to 12 months might seem unproblematic for many journal outputs in SHAPE disciplines. But we do not believe that there should be such a reduction when there is still uncertainty about what arrangements for the long-term sustainable support of OA journal publishing might follow the transitional agreements. Without such reassurance about funding models, and in the absence of a full impact assessment on the sector, the policy should not

gamble with the future of the SHAPE journal publishing ecosystem by setting an embargo period of only 12 months for this REF cycle.

Section B: tolerance limits, implementation date

9. Do you agree that changes to the open access policy for journal-based publications should be implemented from 1 January 2025?

Yes / **No** / Not sure / No comment

Please provide any further comment

We are not against the implementation date of the policy for journal publications being based on the publication date, because this may bring clarity. But we have argued in Q6 and Q8 against significant changes to the journals policy in this REF cycle, particularly while there is still uncertainty about what arrangements there will be for the future long-term sustainable support of OA journal publishing. We therefore believe it would be inappropriate to implement policy changes until this has been resolved, particularly for the benefit of SHAPE learned society journal publishers facing uncertain financial futures.

Further, if the final policy is not to be announced until late summer or autumn 2024, then to impose it on journal outputs published from 1 January 2025 would in any case be far too soon.

This would represent a shorter lead time than was the case when the UKRI OA policy for journal articles was introduced. It would also inevitably mean that the policy would apply to outputs that would have already entered the publishing process before the policy was announced; many journals in SHAPE disciplines would not have the resources to be able to accelerate their publishing schedules should they need to publish articles accepted under the previous guidelines before the introduction of the new ones. If only to avoid this confusion, there should be more advance notice of when the policy will change.

10. Do you consider that tolerance limit for articles and conference proceedings should be retained at 5% of any submission?

Yes / **No** / Not sure / No comment

please provide any further comment

We welcome the fact that outputs for which an exception is claimed will not be counted within the non-compliant tolerance limit. But when units of SHAPE disciplines within HEIs are suffering reductions in size and cuts to research budgets, it is important that institutions and individuals are not inadvertently penalised by the statistical impact of tolerance levels that are too low, and therefore threatened further. In REF 2021 there were many small Units of Assessment (UoAs) across different HEIs submitting to Panel D, and there will be more now: for these, a 5% tolerance band would be meaningless because of their small number of submitted outputs. So a tolerance level of 10% would be more appropriate. We would also welcome reassurance and clarity of wording that HEIs will only be judged by whether they are inside/outside of the tolerance limit (i.e. a binary compliance).

The REF OA policy should be in harmony with the People, Culture and Environment (PCE) element of the REF: the elements are deeply intertwined. The PCE element should not introduce perverse incentives by encouraging UoAs to cite over-burnished OA compliance percentages. Rather, the PCE element should be used positively to promote OA (and open research more generally), in ways that support good research cultures, and address EDI issues (e.g. the needs of ECRs). In particular the PCE element should reward HEIs that empower their libraries to engage more proactively with collaborative models to support OA.

Section B: exceptions

11. Do you agree with the proposed exceptions for journal publications?

Yes / No / Not sure / No comment

Should any of the above be removed?

We welcome the six exceptions that are proposed for journal publications.

We welcome the inclusion of exception 1, concerning articles with third-party content 'for which licences could not be obtained': an article can require significant use of one or more pieces of third-party content (whether text or images), and the redaction of that content would render the argument meaningless. We further think it should be made clear that justifiable reasons for not being able to secure a licence should include not just where a rights holder has declined to grant an OA licence, but also where the licence fee is prohibitively expensive.

We also welcome the inclusion of exception 6, concerning instances where 'the most appropriate publication' for an article does not meet the required embargo period. Many SHAPE articles are most appropriately published, often in languages other than English, in non-UK journals, which may not recognise UK-specified OA obligations.

It is crucial that the process for claiming exceptions for both journal and longform publications should be a light touch one, with authors simply being able to submit a notification, and with no authorisation being required from REF or HEI administrators. Indeed, it should be made clear to HEI administrators that, in preparing their REF submissions, they should not exercise any prejudice against an output for which an exception has been properly claimed.

What, if any, additional exceptions might be required?

A distinction is needed between a 'conference contribution published in conference proceedings' (REF 2021 output type E), which is governed by the journal articles policy, and a conference contribution published in an 'edited book' (REF 2021 output type C) or as a 'book chapter' (REF 2021 output type B), which are governed by the longform publications policy. Guided by the 2019 British Academy report on 'Open Access and Book Chapters', UKRI specifically acknowledges in its definitions of output types in its OA policy (Annex 1) that some outputs from conferences may be published in the form of an edited collection (i.e. a longform publication): 'An edited book collection may arise from a conference, but it is constructed as a publication in its own right rather than reproducing the proceedings of the conference'; the definition of book

chapter 'includes chapters in academic books arising from conferences'; and 'If there is ambiguity as to whether a published conference paper will constitute a research article or book chapter, the Author(s) in consultation with their Research Organisation can apply discretion as to which set of requirements to follow.' In order to achieve commonality between the UKRI and REF OA policies as to which outputs are governed by the journal articles policy and which by the longform publications policy, the detailed definitions of output types for REF 2029 must be updated to match the differentiations that are in the UKRI OA policy.

Section C: longform outputs (monographs, book chapters and edited collections)

Section C: publication, deposit and embargo

12. Do you agree that there should be no deposit requirement for longform publications, but that they should be made immediately available as open access upon publication (or no later than 24 months following publication if subject to an embargo)?

Yes / **No** / Not sure / No comment

Please provide further comment

We agree there should be no deposit requirement where the longform VoR is made available OA.

We believe the optimum way of achieving longform OA is through the VoR, which typically contains a much greater degree of value added through the publishing process than is the case for journal articles. But this would need proper funding, and as we note in Q4, there is no imminent prospect of additional resource to fund OA VoRs for longform outputs being submitted to the REF. Therefore the default OA compliance requirement of the proposed policy would be via the AAM (with embargo). But a longform AAM is a much less desirable version for users, who are likely to have to consult the VoR anyway. We do not believe that imposing this second-best OA route for longform outputs will have the transformative impact on the 'visibility' of SHAPE disciplines that is sometimes claimed for OA, and we do not believe it would match the reach that many traditionally published SHAPE longform outputs - both trade and 'crossover' books - already have across and beyond academic readerships.

In addition to the concerns we have about embargo periods (Q13), we believe that longform OA via AAM deposit would bring its own costs for the HEI sector (repositories, administration), and it is not clear that these have been properly quantified: a full impact assessment is needed.

We therefore argue that during the current REF cycle the focus should be on exploring sustainable routes to OA for longform outputs.

13. Do you agree with the proposal of a maximum embargo period of 24 months for longform publications?

Yes / **No** / Not sure / No comment

Please provide any further comment

The justification for the proposed maximum embargo period of only 24 months for a longform publication is that 'most sales' are in the first two years. The significance of sales in later years cannot simply be discounted. And the premise does not take account of any possible change in behaviour by purchasers (particularly libraries facing budgetary challenges) when it is known that an AAM of (say) a highly specialist monograph will be openly available within 24 months; will a publisher become more cautious about publishing (say) an ECR's first book? The possibility of EDI impacts like this requires a fuller assessment. We know there are a range of opinions on the impact on sales of an OA AAM being available, but firm evidence is needed to provide reassurance that sales will not be adversely affected. Without that, and without steps taken to promote more collaborative approaches by HEI libraries to supporting OA, the policy should not gamble with the future of the academic book publishing ecosystem by setting an embargo period of only 24 months. Indeed, too short an embargo period may simply be ignored by publishers - undermining the REF's ability to assess the best research. As we argued in our response to the UKRI OA consultation in 2020, 'any maximum embargo period should not be less than 36 months, and might well have to reach 60 months.' The HE funding councils must now test the impact on sales of different embargo periods for AAMs to inform policy for the following REF.

Section C: access, licensing

14. Is licensing for third party materials not being granted a reasonable ground for exemption from open access requirements?

Yes / No / Not sure / No comment

Please provide any further comment

We have consistently argued that there should be OA policy exemptions for longform outputs requiring significant reuse of third-party materials. Many books in SHAPE disciplines (particularly those dealing with literature, arts and music) make use of such materials (both text and images), and it would negatively impact the overall analysis and argument of such works (indeed would make them meaningless) if the books were disseminated without materials that could not be included because OA licensing was unobtainable or unaffordable.

As we argue in Q19, scholarly editions, scholarly illustrated catalogues and exhibition catalogues should be out of scope of the REF policy (just as they are out of scope of the UKRI policy), and that would remove the need for many exemptions to be claimed for third-party content complications.

15. Is sharing of a version of an output without third-party materials if licensing can't be obtained, mirroring the UKRI open access policy for longform outputs, appropriate to meet the open access requirements for REF 2029 policy?

Yes / No / Not sure / No comment

Does this present issues for output submission and assessment?

The redaction of an image or other unavailable material and its replacement by a 'tombstone' is a highly undesirable approach. In many SHAPE disciplines, particularly in art history and in the study of 20th-century music and literature, the analysis and argument in any book or chapter would be meaningless without the images or texts reproduced alongside. This would fundamentally undermine the integrity of the publication and the excellence of the research that underpinned it.

Section C: tolerance level

16. Do you agree with the principle of a tolerance level for non-compliant longform outputs?

Yes / No / Not sure / No comment

Please provide any further comment

We argue in Q18 that it is premature to implement an OA policy for longform outputs in the current REF cycle. But if OA is to be extended for the first time to longform outputs submitted to the REF, it would be essential that there is a suitably generous tolerance level for non-compliant outputs. We welcome the fact that outputs for which an exception was claimed would not be counted within the non-compliant tolerance limit.

17. Do you agree with the proposed tolerance level of 10% for longform outputs?

Yes / No / Not sure / No comment

Please provide any further comment

As we argued in Q10, at a time when institutions and departments across disciplines and across the HE sector are facing numerous pressures and suffering reductions to budgets for research, it is important that any REF OA policy should not result in unintended consequences for the future sustainability of research by further penalising institutions, disciplines and individuals through the statistical impact of tolerance levels that are too small. Longform outputs are important for SHAPE researchers and their careers, at all stages, as is inclusion in institutional REF submissions. It would be unfortunate if the careers of individuals (particularly those who may have less access to OA resources, such as ECRs) were compromised, through no fault of their own and in spite of the quality of their research and outputs, if any tolerance level were too narrow to take into account the challenges of achieving OA compliance for longform publication. We therefore believe that a tolerance level of 30% would be appropriate for longform outputs. Even with such a generous tolerance level, the REF policy would still have achieved its aim of raising awareness of the possibilities for OA for longform outputs.

Section C: implementation

18. Do you agree with the proposed date for implementation of an open access policy for longform outputs in REF 2029 being for all longform publications for which contracts are agreed from 1 January 2026?

Yes / **No** / Not sure / No comment

Please provide any further comment.

We welcome the fact that the proposed implementation start date would be defined by the date on which longform outputs are contracted rather than the date on which they will be published. Given that it can frequently take two years to get from book contract to book publication, this would reduce the number of books submitted by the end of the 2028 census deadline that would be governed by the REF 2029 OA policy. In practice this would then be about laying the policy foundations of the following REF cycle.

Nevertheless, the proposed lead time ahead of implementation would be about a year shorter than was the case for the UKRI OA policy; and given the REF policy would ultimately relate to a larger number of longform outputs, there would be little time for academic book publishers of varying sizes and resources to assess the potential future impacts of the proposed policies and to make longer-term strategic decisions that take account of them.

Given the current lack of any financial sustainability for OA longform publications (with HEIs unlikely to be able to afford paying for OA through their existing QR funding), the uncertainty about what publishers' policies in respect of AAMs would actually be, and the potential for a scramble to contract books prematurely ahead of the deadline, we strongly advise the implementation date should be deferred until at least the start of the following REF census period, by which time fuller research can be undertaken (see Q13).

Section C: exceptions

19. Do you agree with the proposed exceptions for longform publications?

Yes / No / Not sure / No comment

Should any of the above be removed?

We welcome the seven exceptions that are proposed for longform outputs.

We welcome the inclusion of exceptions 1 and 7, concerning instances where 'the only appropriate publisher' or 'the most appropriate publication venue' for a longform output does not offer a compliant OA option or meet the required embargo period. While we think it is fair to invite authors to consider the appropriateness of their publisher, we believe that this exception is important for guaranteeing the primacy of author choice. Many books are most appropriately published, often in languages other than English, by non-UK publishers, who may not recognise UK-specified OA obligations. There is also a well-known 'long tail' of small publishers who are the most appropriate outlet in specialist contexts. And sometimes the most appropriate publisher may simply be the one who proactively commissioned and curated a work by an author, perhaps in a specialist series.

It is welcome that trade books are exempt from the proposed REF OA policy (as they are out of scope of the UKRI OA policy), but we believe that for the REF the definition should be broadened to include 'crossover' books that fulfil a valuable role in reaching both academic and broader public readerships.

As we argued in Q11, we believe that the process for claiming exceptions should be a light touch one, with authors simply being able to submit a notification, and with no authorisation being required from REF or HEI administrators.

Are there other exceptions you think are necessary for longform outputs? Please provide evidence in support.

We note that trade books and creative works are exempt from the proposed REF OA policy for longform outputs, making it consistent with the UKRI OA policy. However, the following output types are not listed as being exempt from the REF policy although they are out of scope of the UKRI policy: scholarly editions; scholarly illustrated catalogues; exhibition catalogues; textbooks. The UKRI policy's exemption of scholarly editions and scholarly illustrated catalogues is particularly sensible because it avoids third-party rights complications. There must be consistency between the UKRI and REF policies, an aim clearly stated in the documentation for the 2020 UKRI OA consultation (para 29): 'As far as possible, they [UKRI and UK HE funding bodies] are seeking commonality between the UKRI and REF-after-REF 2021 OA policies, including a common policy position for outputs that fall within the scope of both policies. ... The UK HE funding bodies' intention is that compliance with UKRI's OA policy will result in compliance with the OA policy for the REF-after-REF 2021'; and that latter intention was repeated in the REF 2028 'Initial decisions' document. If there is no commonality between the two policies in respect of these exemptions, a scholarly edition published with no OA version could be compliant with the UKRI policy but not compliant with the REF policy - and that situation is not supposed to be possible. The final drafting of the REF policy should avoid this confusion.

PART IV

Additional arguments in support of the British Academy's response to the REF 2029 Open Access Consultation

- 1 This section contains additional arguments that could not be included within the character-limited pro-forma consultation response document, but which we believe need to be taken account of in the formulation of any open access (OA) policy for REF 2029.

(a) REF OA policy for journals

- 2 In our response to **Q4**, we provided a brief overview of the current OA landscape for journals, including some specific observations in respect of journals published by SHAPE learned societies. The following paragraphs elaborate on that overview.
- 3 Journal articles are the dominant form of academic research communication (in REF 2021, 82% of submissions to Main Panel C, 40% to Main Panel D).¹⁸ OA policies have already been in place for journals for many years, and we recognise that since REF 2021 there has been a welcome increase in the number of journal articles in SHAPE disciplines that are now available OA. To a significant extent, immediate OA of the version of record (VoR) of journal articles has been made possible through Jisc transitional agreements.¹⁹
- 4 But we are aware of worries about OA expressed by learned societies and subject associations, which are responsible for many journals published in SHAPE disciplines. A British Academy survey of Learned Societies and Subject Associations Network (LSSAN) members in November 2023 revealed considerable concerns about the impact of OA on their journal publishing (concerns endorsed at a subsequent meeting of members). Causes of concern included:
 - pressures from commercial partners to publish more articles under Read & Publish (R&P) deals, threatening the academic integrity and quality of journals;
 - reduced publishing opportunities for those authors not covered by R&P deals or able to source funding for article processing charges (APCs), which may include ECRs, academics on casual contracts, retired academics, independent scholars, and Global South academics;

¹⁸ In respect of the natural sciences disciplines, journal articles formed 99% of REF 2021 submissions to both Main Panel A and Main Panel B.

¹⁹ There have also been cOAlition S 'transformative arrangements'.

- expectations of a significant drop in future income earned from journal publishing ('by about a third') – indeed, 70% of respondents predicted a real terms decrease by 2027;
 - anxiety over what arrangements for supporting OA might follow the 'transitional' agreements, with 74% of respondents having no firm expectations of their journals ever being able to 'flip' to fully OA;
 - a knock-on effect of these financial worries on LSSAN members' ability to conduct their charitable activities in support of their disciplines (including research funding, academic events, and support of ECRs).
- 5 On that last point, funding bodies may have no obligation to protect the income that societies and associations receive from journal publishing to fund those charitable activities. But those activities promote specific SHAPE subject areas (some of them minority ones with few other champions), including nurturing fragile pipelines of future students and academics, and so form a crucial part of the disciplinary ecosystem which cannot be denied or ignored – and we take this opportunity to speak up for them.
- 6 We believe that the issues raised by LSSAN members are indicative more generally that OA for journals is not yet sustainably entrenched in SHAPE disciplines. This is confirmed by the March 2024 Jisc report, [A review of transitional agreements in the UK](#), which reveals that the transition to OA is much slower in SHAPE journals than in STEM ones;²⁰ and the report more generally bemoans the slow rate at which all journals are 'flipping' to fully OA.²¹
- 7 We believe that these uncertainties about the future sustainability of OA for journal articles in SHAPE disciplines confirm the following positions we have argued in our response:
- that the implementation date should be postponed (**Q9**);
 - that the embargo period for the author's accepted manuscript (AAM) version of a journal article should not be reduced from 24 months to 12 months (**Q8**); and
 - that -NC (NonCommercial) should be retained as an allowable element in a Creative Commons licensing for journal articles (**Q6**).

(b) REF OA policy for longform outputs

- 8 In our response to **Q4**, we provided a brief overview of the current OA landscape for longform outputs, in which we drew attention to the difference between the proposed REF OA policy and the UKRI policy, to the improbability of higher education institutions (HEIs) being able fund any additional OA costs (see section (c) below), and the implications of OA compliance being based on the author's accepted manuscript (AAM). The following paragraphs elaborate on that overview.

²⁰ Jisc (2024), [A review of transitional agreements in the UK](#), Figure 12, p. 44.

²¹ [Ibid.](#), p. 14: 'Based on the journal flipping rates observed between 2018-2022 it would take at least 70 years for the big five publishers to flip their TA titles to OA'.

- 9 Longform outputs are a key medium for SHAPE disciplines. In REF 2021, 45.7% of Main Panel D submissions were longform. For Main Panel C overall, 13% of submissions were longform, but the proportions were higher in specific Units of Assessment (e.g. 34.5% for Law, 32.3% for Archaeology).
- 10 OA arrangements – in the form of policies, funding, infrastructure – are much less developed for longform outputs. In 2021 UKRI extended OA policy to longform publications for the first time and prepared the way with many stakeholder conversations and other pieces of research (both before and after the formal 2020 consultation). This UKRI policy – which only relates to outputs from work supported by the UK Research Councils – does require longform publications to be made available OA; but it recognises the primacy of the VoR by making available funding (£3.5m) to support its immediate OA publication.²²
- 11 Any REF OA policy for longform outputs will cover many more publications than the UKRI policy does, because most books do not arise from Research Council-supported work. The cost of supporting the REF policy with equivalent funding for immediate publication of the VoR would be much higher, and there have been various attempts to calculate it. Anthony Cond and Peter Berkery of the Association of University Presses have produced a figure of £92.7m for all books submitted to the REF across a 7-year cycle.²³ Patrick Grant, Tanita Casci and Stephen Conway of the University of Oxford have calculated that £20m would be needed for Oxford alone to cover all longform outputs in the potential pool of submissions to the REF.²⁴ Unlike the UKRI policy, the REF policy is not accompanied by any promise of additional funding to support longform OA. And, as we argue further in section (c) below, in the present climate HEIs cannot be expected to use QR funding to pay for longform OA, without a substantial uplift.
- 12 It is therefore inevitable that, in the great majority of cases, the default route to compliance with the proposed REF OA policy for longform outputs will be through deposit of the AAM, under embargo. But the appropriateness of the longform AAM in this role needs to be questioned. The AAM for a book is not equivalent to the AAM of a rather long journal article: much more value is typically added in the book publishing process to create the VoR. This is especially the case for works of primary source material – scholarly editions, and scholarly illustrated catalogues – where more complex presentation (in typography or illustration) is added after the AAM stage. And there is no evidence of any appetite amongst SHAPE academics, either as readers or as authors, for book outputs to be used and received into the scholarly record in AAM format.²⁵

²² The application process for this funding is somewhat convoluted (because only research organisations can apply and be paid), and the fees payable as book processing charges (BPCs) and chapter processing charges (CPCs) are capped. But the provision of such funding led to general acceptance of UKRI's longform policy, even though it included an embargo period of only 12 months for the AAM deposit route to compliance.

²³ Cond, A. and Berkery, P. (7 June 2024), '[Is 0.66 percent of QR funding too much to ask for OA books?](#)', *LSE Impact Blog*.

²⁴ Grant, P., Casci, T. and Conway, S. (11 June 2024), '[Open excess: remove open access burden from REF](#)', *HEPI blog*.

²⁵ In its [response to the REF OA consultation](#), the Royal Historical Society reported that 65% of respondents to a survey of its members 'stated they were unwilling to have the text of their book deposited in a repository, or did not know how to answer this question'.

- 13 However, the REF OA proposals are not accompanied by evidence to allay fears that, in spite of their best intentions to maintain strong research collections, academic libraries facing budgetary challenges may trim their purchasing of (say) more specialist books, or those by ECRs, if they know that an AAM version, however unsatisfactory, will be freely available only two years after publication.
- 14 And no evidence has been presented to allay fears that publishers, faced with what they may judge too short an embargo period, may change their commissioning decisions – perhaps again at the expense of more specialist books or those by ECR. There is an EDI issue here that cannot be ignored. Particularly at risk may be those scholarly editions and scholarly illustrated catalogues, sometimes in long-running multi-volume series, in which publishers typically invest a high degree of curation, in the expectation of sales spread over many years.²⁶ Equally, book publishers should not be discouraged from the extra curation involved in producing an edited book collection from what was originally a conference.²⁷
- 15 Longform publication also has a strong international dimension, including outputs in languages other than English. Though we acknowledge in our response to the consultation (**Q19**) that the proposed exception for ‘the most appropriate publication venue’ should empower longform authors to place their work with appropriate non-UK publishers (which may not recognise UK stipulations), we are concerned that HEI administrators may be prejudiced against such outputs when preparing their REF submissions for fear of seeming to rely on too many ‘exceptions’.
- 16 Finally, no evidence has been presented that quantifies the cost to HEIs of such a large extension of OA policy, which is likely to be significant, in terms of repositories, but even more simply in terms of administration.
- 17 We believe that the proposed REF OA policy risks disincentivising the writing and publishing of books. To avoid the policy gambling with the future of the academic book publishing ecosystem, we have argued the following positions in our response:
- the implementation date should be postponed until the next REF cycle (**Q18**).
 - the embargo period for the author’s accepted manuscript (AAM) version of a longform output should be at least 36 months, possibly as many as 60 months (**Q13**).
 - scholarly editions, scholarly illustrated catalogues, exhibition catalogues, and textbooks should all be defined as being ‘out of scope’, to achieve the commonality with UKRI OA policy that was previously promised (**Q19**); and edited collections that happen to arise from conferences should be clearly defined as ‘edited books’ (output type B), again in line with the UKRI OA policy (**Q11**).

²⁶ The investment by publishers in scholarly editions and scholarly illustrated catalogues is, of course, more than matched by the efforts of the individual academics who edit and compile them. There are those who feel that the patient and diligent scholarship that goes into producing volumes of such fundamental and lasting value does not always get the recognition that it deserves (e.g., see John Marenbon FBA’s article in the *British Academy Review*, March 2011, p. 47). It would be a shame if a REF OA policy carelessly undermined the whole basis on which such volumes are published.

²⁷ The REF 2021 definitions for outputs, which still seem to apply, suggest that any output arising from a conference would be classified as a ‘conference contribution’ (output type E), even if published as a book; the output would therefore follow the OA stipulations for journal articles, and under the proposed policy the embargo period for an AAM would be even shorter. See the 2019 British Academy report, *Open Access and Book Chapters*, pp. 13-15, for a discussion of the difference between an edited book collection and ‘conference proceedings’.

(c) The broader context for higher education institutions

- 18 In our response to **Q4**, we argued that ‘In the current climate it would be disingenuous of the HE funding bodies to expect existing quality-related (QR) funding to be used by HE institutions (HEIs)’ to fund OA publication of the version of record (VoR) of longform outputs.
- 19 To understand the implications of the proposed major expansion of OA into longform outputs, a medium of great importance for SHAPE disciplines, we need to examine the capacity of HEIs to meet any additional resource requirements. The extra costs of implementing and administering any new procedures need to be considered. But, even more importantly, if money were needed to pay for the VoR of longform outputs to be published as OA, and if additional funding were not provided to HEIs to support that, what capacity would HEIs have to meet such financial expectations from their existing resources?
- 20 As unencumbered QR funding is allocated to HEIs based on REF outcomes and research volume, it has been described as ‘the invisible force holding up the UK’s research ecosystem’.²⁸ It plays an important role in supporting the training and development of ECRs and helping to safeguard the pipeline of new researchers entering the system. QR is used at the discretion of HEIs to support a wide range of research activities, as argued in a recent briefing published by the British Academy.²⁹
- 21 HEIs in the UK are currently facing financial pressures on multiple fronts. The real terms value of student funding is declining across the UK.³⁰ A real terms decline in student maintenance is placing increased pressure on HEIs to support their students through grants and other forms of support. International student income for many HEIs is being put under threat by fluctuations in the international student recruitment market and changes to domestic immigration policies. Revenue from international students is particularly relevant in the context of research and OA because it has traditionally been used to cross-subsidise research activities, which are not funded at the full cost of delivery, which is known as Full Economic Cost (FEC). And the real terms value of research funding is also declining. QR funding has historically been used to make up shortfalls from grant funding related to the FEC of research. But this is becoming less sustainable, with recent data suggesting that HEIs are now on average recovering less than 70% FEC.³¹
- 22 This perfect storm of funding challenges is already placing great pressure on the allocation of QR funding. We therefore do not believe that HEIs can absorb new OA costs into their QR allocations in the current climate, and therefore no further expectations should be placed on HEIs by the funding bodies to use these funds to

²⁸ Smith, S. (2019), ‘[The invisible hand that supports quality research](#)’, *Wonkhe comment*.

²⁹ British Academy (May 2024), [Recurrent Research Funding Across the United Kingdom: The landscape in the four devolved administrations](#).

³⁰ British Academy (2023), [Student Funding Across the United Kingdom: Tuition and maintenance in the four nations and the impact of inflation](#).

³¹ Being unencumbered, the nature of much research funding also enables cross-subsidies in institutions, therefore also facilitating the kind of rapid response work which crises such as the COVID-19 pandemic necessitate. In an increasingly uncertain world, this reflexive capability remains important. [Recurrent Research Funding](#), p. 5.

support new OA policies. To do so would amount to asking HEIs to do more with less in an environment where resources are already strained.

- 23 If the optimum route for longform OA (i.e. through the VoR) cannot be met through additional funding or through existing QR resources, and if – as we have argued above – sub-optimal routes risk undermining the creation and submission of longform outputs for the REF, then we are concerned about the possibility of a vicious circle in which insufficiently resourced OA has an impact on institutional REF outcomes, which in turn could have an impact on QR funding awards, which in turn could mean that less high-quality research can be supported in future – particularly in SHAPE disciplines.
- 24 This is why we argue that there needs to be further modelling and assessment of the potential impacts of the proposed OA policy changes on researchers, institutions and the wider research ecosystem, to avoid long-term harms – including harms to ECRs, to smaller and more specialised HEIs, and indeed to REF’s stated aim of ‘assessing the excellence of research in UK higher education providers’.

PART V

Better ways forward

- 1 The benefits of open access for stimulating academic exchange are clear³² – when it is done fairly, sustainably and responsibly. It is in the interests of funders and policymakers wishing to see growth in open access to set in place sustainable arrangements that can be welcomed by all. The aims of open access we all wish to see are not well-served when imposed policies lead to adverse and unintended consequences through the behaviours of those reacting to the policies – whether libraries, publishers, administrators or individual academics.
- 2 For journals, funders need to provide greater certainty about what resources will be available to support open access in the long term – to go beyond ‘transitional’ arrangements so that open access can be more securely embedded. Are there opportunities to develop different approaches? When the international group of funding bodies in cOAlition S says that it is interested in financially supporting Diamond open access for ‘community-based’, ‘scholar-led’ publishing initiatives, what does that mean in practice?³³ This might be a way of helping learned society publishers, but it is not apparent that any workable, sustainable funding mechanism has yet materialised.³⁴
- 3 New thinking is even more necessary for open access book publishing. Better ways need to be found to channel money already in the system to support open access – providing continuing resource for the long term, not just seed funding for improved open access infrastructure. At a symposium on ‘[Opening the Monograph: its future within an open scholarly landscape](#)’ held in Liverpool on 26 April 2024, senior figures from across the UK funding, university, library and publishing sectors discussed the role that collaborative library models could play in funding open access for academic books, as alternatives to models based on book processing charges (BPCs). Such collaborative models do exist, but the need for better cross-sector co-ordination was clear, particularly as representatives of HEI libraries revealed the constraints they felt from within their own institutions to contribute to such collaborative efforts as more than a budgetary ‘extra’. There is a role that the REF can play here, particularly through the People, Culture and Environment (PCE) element, to authorise and incentivise UK HEIs to empower their own libraries in this regard, in a way that would help transform the flow of resources for open access. It must also be recognised that academic book publishing is an international activity, and UK-published books by

³² The role that open access can play in broadening the readership of publicly funded research may be thought to align with the new ambition of the Department for Science, Innovation and Technology (DSIT) ‘to maximise the potential of digital, data and technology to deliver for the British public’: DSIT (8 Jul 2024), ‘[DSIT bolstered to better serve the British public through science and technology](#)’.

³³ cOAlition S (October 2023), *Towards responsible publishing: a proposal from cOAlition S*, p. 7. The findings of cOAlition S’s consultation on its ‘Towards Responsible Publishing’ initiative have now been published, but these focus on issues relating to preprints and open peer review (*“Towards Responsible Publishing”: Findings from a global stakeholder consultation*, July 2024).

³⁴ A discussion of OA business models for journals, including Diamond OA, is contained within the White House Office of Science and Technology Policy (June 2024), *Updated Report to the U.S. Congress on Financing Mechanisms for Open Access Publishing of Federally Funded Research: A Report by the White House Office of Science and Technology Policy*.

academics based in UK HEIs have been significantly financed by global sales – so there needs to be an international dimension to this collaborative effort, because the UK alone cannot fund open access for the world.

- 4 Long-term sustainable solutions for the provision of open access, particularly in a climate of overall budgetary constraint, require dialogue and collaboration across sectors – funders, libraries, publishers, HEIs and other research organisations – to maximise the efficient use of the resources that are collectively available. Complex and difficult conversations will be needed in order to overcome inertia and promote the broader interest. This dialogue is urgently needed, and the British Academy stands ready to help play a convening role in this.