



Association for Art History – Plan S Public Consultation Response

The Association for Art History (AAH) leads the collective effort in the UK to advance the study and practice of art history. We serve over 1,000 members from within and outside of the UK and represent the interests of art historians, members and non-members alike. We publish the highly respected journal, *Art History*, a leading international publication in this field.

The Association is a member of the Arts and Humanities Alliance (AHA) and has contributed to that organisation's consultation response to Plan S as well as its efforts as a member of the UUK Open Access Monograph Working Group. Like other members of this group, we support the aims espoused in the cOAlition S guidance for broad and free online access to scholarly research. However, we share the concerns as provided in the AHA response and in the Past and Present open letter regarding the Plan S consultation, to which we are one of the many signatories.

Our comments will not seek to replicate these responses, but rather will briefly highlight how Plan S will affect humanities publishing, specifically art history, while being mindful of the two questions posed by cOAlition S in its guidance for feedback:

1. Is there anything unclear or are there any issues that have not been addressed by the guidance document?
2. Are there other mechanisms or requirements funders should consider to foster full and immediate Open Access of research outputs?

As Plan S was initially devised with STEM subjects (science, technology, engineering and mathematics) in mind, it understandably applies more easily to those disciplines than it does to humanities disciplines in terms of its proposed funding model and license restrictions. In order to achieve its aims within disciplines such as art history, Plan S would need significant adjustment in those areas.

Funding Model

Most research in art history and in the humanities more broadly is self-funded, is supported by higher education institutions (through student fees, profits earned by trading subsidiaries, private fundraising and from QR funding based on REF results) and is supported directly by charitable foundations. While the Arts and Humanities Research Council (AHRC) is among the Plan S signatories, none of the other funders are, and most research that appears in humanities scholarly journals is not funded by those signatories. Based on a 2017 survey of 350 articles published in five UK journals, the Royal Historical Society found that on average only 8% (ranging from 0 to 17%) were supported by Plan S signatories. The Past and Present Society provides that in history journals about 15% of articles are published in Gold Open Access as most researchers do not have access to APC (article processing charge) funding (see the above link, p 2).

Within our own journal, the results are even more stark. In over 100 articles published in the years 2016-2018 in *Art History*, only one, i.e. less than 1%, was supported by funding from a cOAlition S signatory (AHRC).

We are very encouraged that private funders such as the Wellcome Trust and the Gates Foundation have become cOAlition S signatories and, therefore, will presumably support APCs in STEM subjects. However, there are no corollary funders in the humanities who can step into the funding breach to support art-historical and humanities research within an Open Access (OA) system, particularly one, as contemplated by cOAlition S, that does not recognise Green OA or hybrid OA status as being compliant. This means, of course, that the burden for raising APC funding will shift to the authors themselves, an undesirable and untenable consequence of the swift move to the requirement of Gold OA status.

In order for research to be Gold OA compliant in the humanities, funding would have to be significantly increased for APCs, with either more funders signing on to cOAlition S or increased funding being offered to HEIs to help support these costs. And even if this could be put in place, it would not address the situation of those young in their careers and those without institutional affiliation or funding. These early career researchers, often members of the precariat, and others who may work at museums and galleries with no access to institutional research funding, would be hit hardest by the implementation of Plan S. It is unrealistic to expect that they will be able to afford the APCs (and BPCs, book processing charges) necessary to publish in order to enter the academy with a more secure, permanent status.

Timescale

We appreciate that cOAlition S intends to commission an independent study on OA publishing costs, and while a date has not been set for this, arguably it should have been conducted prior to a date established for the implantation of Plan S. The plan was announced in September 2018, consultation closes in February 2019 and implementation is to take effect 11 months hence. Considering the questions posed as part of this consultation, we ask whether it is realistic to think that a new funding structure will be in place by the time the mandate is put into effect? As this will not be the case, what mechanisms will there be to bridge the gap between implementation and new funding streams to support authors procuring APCs?

Limiting the scholarly dialogue

Another consequence of the Plan is that it will limit the ability of authors from outside the UK and the EU—where OA mandates and funding mechanisms are not in place—from participating in scholarly exchanges taking place in UK journals, thereby making these journals less international in scope and more insular. This will have worse consequences on authors from the Global South where access to institutional or external funding is very limited. With *Art History* and with a number of publications in the humanities, we strive to add the new perspectives that authors from outside the EU and North America can bring. Without funding in place to support these authors' APCs, their voices will not be heard, and this runs counter to the aims of Plan S to disseminate scholarship as broadly and make it as accessible as possible.

Licences

Plan S allows only for the least restrictive Creative Commons Attribution license, CC BY 4.0, under which authors' text can be copied, redistributed, adapted, transformed and built upon for any purpose, including commercial, provided the author is cited. To protect authors' intellectual property rights in their own work, we would advocate for the CC BY-NC or ND licenses. As with the funding model, the imposition of a license that may be more fitting for STEM subjects, where scientific research needs to be reused and results need to be replicable, is not appropriate for the humanities. The kind of use contemplated by Plan S is contrary to best practice in the H&SS where not only the content but also the form

of the text is crucial. It is also contrary to how students in these disciplines are taught to treat others' text and at its worst application increases the risk of plagiarism. Allowing for the NC and ND variants would decrease this risk.

The Plan S guidance provides that content owned by third parties (such as images or graphics) included in a publication is not affected by the requirements of the plan. While Plan S will respect the rights of third-party licensors, it does not acknowledge the extra cost that those licenses represent for OA use. As it is now, authors can pay hundreds of pounds for permission to reproduce a single image from museums, libraries and licensing agencies in their publications, and this is for non-OA licenses. Naturally, art historians in particular are faced with these fees which can be much higher if not cost-prohibitive for OA licenses. Without a new funding structure in place for Plan S, many authors, especially those early in their careers or without affiliation will simply be priced out of sufficiently illustrating their articles if not from publishing in OA altogether.

Conclusion

The Association for Art History supports the essential goal of Plan S to disseminate scholarship as broadly and freely as possible on line. However, applying the Plan S funding and licensing models to humanities disciplines may very well be counterproductive to these aims and serve to limit the ability of authors to publish their scholarship if they are to pay for APCs or subscribe to Plan S without sufficient humanities funding being in place as part of the coalition. It would potentially create an imbalance where well-established scholars from institutions in the West are more readily able to publish in the new landscape while disadvantaging those from areas such as the Global South and those earlier in their careers. We are heartened that cOAlition S has stated its intention to address these imbalances and we are committed to working with the coalition to ensure that OA is made affordable and available to all researchers. However, we remain concerned about the timetable for implementation and advocate for a closer correspondence between the commencement of Plan S and the creation of reasonable funding alternatives for those in the humanities.