

Cylchlythyr | Circular

Outcomes of the consultation on funding arrangements for Wales Studies publications

Date: 07 June 2022
Reference: W22/15HE
To: Heads of higher education institutions in Wales
Response by: No response required
Contact: Clare Davies
clare.davies@hefcw.ac.uk

This circular provides the outcomes of the consultation in circular [W21/37HE: Consultation on the funding arrangements for Wales Studies publications](#), together with the updated funding arrangements.

If you require this document in an alternative accessible format, please email info@hefcw.ac.uk.



Noddir gan
Lywodraeth Cymru
Sponsored by
Welsh Government

Background

1. Since 1998 HEFCW has supported the publication of books related to Wales Studies by the University of Wales Press (UWP). This publications fund, paid directly to UWP, was introduced to support the publication of 15 Wales Studies (a broad field that includes the study of the literatures of Wales in Welsh and English, history, politics, and social sciences, among other disciplines) publications each year.
2. In 2011, the fund was re-directed to individual Higher Education Institutions (HEIs) in Wales. Funding was allocated 50% in proportion to institutions' 2010/11 QR allocations, 50% in proportion to the number of publications supported at each institution from HEFCW's publication fund over the prior three years. This funding was ring-fenced within QR for the purpose of supporting scholarly publications and related activities in the fields of Welsh culture, history, and literature. Institutions have been notified individually of the amounts which have been ring-fenced within their allocations in this way.
3. The fund itself has remained at £132k per annum since 2011. Allocations are set out in the table below:

Institution	Allocation
Aberystwyth	£16,400
Bangor	£16,500
Cardiff	£42,000
Swansea	£28,400
USW	£19,800
UWTSD	£8,900 ¹
Total	£132,000

4. In the context of HEFCW's review of its research funding methodology, HEFCW Council approved the need to pursue alternative funding arrangements for Wales Studies publications in November 2020. After initial information gathering following engagement with UWP and with the sector, a consultation offering an alternative approach to funding opened in November 2021, and responses were received by the end of January 2022.
5. The consultation (circular [W21/37HE](#)) proposed that funding for Wales Studies publications be returned to UWP to manage, with greater oversight and monitoring from HEFCW. This would allow greater assurance of how the money is being used by the sector for the development of Wales Studies. This would also ensure fair competition for funding amongst universities. According to information gathered by HEFCW through informal engagement, institutions have spent these allocations primarily on the publication of books, but occasionally on other activities such as journal article costs, attendance at conferences and related events. However, there has been no dedicated monitoring process for the publications fund, given its position as part of QR.

¹ Includes £2,200 allocated to Centre for Advanced Welsh and Celtic Studies (CAWCS).

6. We proposed that funding for publications could be allocated by an expert panel with representatives from the field of Wales Studies as well as key stakeholders like the Learned Society of Wales. We also suggested that in order to be eligible for funding the author would have to be associated with a Welsh HEI. Finally, we proposed that the funding would be towards the costs of publications only.
7. 18 responses were received in total; 7 institutional, 6 from individuals, 2 from a department or research group, 1 from a subject association/learned society, 1 from Coleg Cymraeg Cenedlaethol and a response from UWP.

Consultation responses – analysis and issues

8. A brief summary of the consultation responses are given below, arranged by question:
 - **Views of HEFCW's approach to return funding to UWP and the panel approach to allocating funding:** Responses were broadly supportive of the proposal, though many offered further suggestions and caveats to be considered. Two respondents disagreed that UWP should manage the funding. The major concerns raised were:
 - The potential monopolisation of Wales Studies by the University of Wales Press
 - The traditional nature of the outputs typically published by UWP
 - The membership and role of the panel
 - Support for Welsh language publications in fields outside Wales Studies
 - The ownership of UWP by University of Wales Trinity St David (through the University of Wales)
 - **Funding UWP and the unintended consequences:** Respondents noted that this could lead to a lack of author choice if only one publisher was in receipt of the funding, and several respondents noted that other publishers would be unable to compete. However, most noted that UWP is the most significant publisher in Wales Studies and that they currently receive the majority of the funding compared to other publishers.
 - **Whether the proposal supports both Wales Studies and the long-term viability of UWP:** The majority of respondents agreed that the proposal achieves both aims, and signalled strong approval for such an approach. Most respondents were keen to see that the long-term viability of the Press is supported. There was some criticism of what was seen as UWP's traditional approach to publishing, and others noted that UWP does need to be explicit about its Open Access (OA) commitments.
 - **Eligibility for funding through association with a Welsh HEI:** Views expressed in the consultation on this were mixed. Many respondents pointed out that many Wales Studies scholars are not based in Wales, and excluding them from this funding would be detrimental to the development of the field. Other respondents noted that HEFCW's remit is to support higher education in Wales and thus *researchers in Wales*. Several respondents were concerned that this could also prevent early career

researchers not in post at a Welsh HEI from publishing their first monograph.

- **Use of funding for publications only:** Most respondents were in support of this approach, acknowledging that it is a small pot of funding and reserving it for publications brings clarity. It was acknowledged by several respondents that there are other funding streams that could legitimately be used instead for conferences etc., such as internal HEI funds.
- **Alternative models:** Alternatives were offered by a few respondents but most agreed that the HEFCW proposal is preferable.
- **Level of funding:** OA demands were a recurring concern, with respondents noting the need to support Gold OA requirements. Respondents also noted the rise in costs of publication since 2011 and the general lack of funding for the arts and humanities, as well as the need to support Welsh language publications.
- **Other concerns raised across the responses include:** the need to define Wales Studies; the need for Welsh language outputs to be supported; the need for longer term funding assurance; the possibility of waiting for results from REF2021 before making a final commitment; and the need to consider value for money.

9. A more detailed summary of responses can be found at **Annex A**.

Final approach

10. On the basis of the consultation responses received, HEFCW intends to continue with the proposal as presented, subject to some minor adjustments as described below.
11. **Funding to be provided to UWP via University of Wales Trinity Saint David, to be managed by UWP:** while we acknowledge the concerns raised by respondents regarding potential monopolization of the field of Wales Studies by UWP, UWP remains the leading publisher in this field, and has the skills, experience and commitment to the publication of Wales Studies not shared by any other publisher either in or outside of Wales. The funding will be provided to UWTSD in its capacity as an institution regulated by HEFCW to provide further assurance. For transparency, we will introduce a requirement for UWTSD to publish an annual report on how the money has been used, which will be monitored by HEFCW. The role of the panel, with an independent chair and representation from all institutions, will also contribute to transparency and fairness.
12. **Decisions on allocation of funding to be made by a panel:** the panel will consider proposals at the prepublication stage as originally proposed, but the annual reporting mechanism will be used to monitor quality and use of funding. While having two panels for publications in Welsh and English may be useful, this would be an additional burden. It is therefore recommended that the Panel should include:

- A representative from the Learned Society of Wales (who will act as Chair)
 - A representative from the Coleg Cymraeg Cenedlaethol
 - A nominated representative from each Welsh HEI to ensure fair representation
 - An observer from HEFCW and staff from UWP.
13. **Eligibility for funding to require association with a Welsh HEI:** while we acknowledge the concerns raised by respondents that the funding should be open to researchers beyond Wales, HEFCW's remit is to support higher education and researchers in Wales. The funding will therefore be for Wales-based researchers. This will include ECRs who undertook their research at a Welsh HEI but who may not be currently employed by a Welsh HEI. HEFCW will publish eligibility criteria before funding is distributed.
14. **The nature of eligible outputs:** while primarily intended for the publication of books, the panel could decide to support articles in journals published by UWP at their discretion, as these are also significant to the field of Wales Studies. The funding is intended for the publications related to the study of Wales, in both Welsh and English. However, this funding is not intended to support Welsh medium outputs on non-Wales Studies areas. The funding will be restricted for publications only.
15. **Level of funding and Open Access requirements:** In the first year, as the new system is put into practice, the current level of funding will be maintained, subject to review in future on the basis of demonstrated demand. We will also strongly encourage UWP to consider the OA requirements for every publication, and review the success of this approach annually, in conjunction with review of the level of funding.
16. **Defining Wales Studies:** HEFCW will adopt LSW's definition of Wales Studies in relation to this fund².

Next steps and timetable

17. This funding will begin from AY2022/23. HEFCW will work with institutions, UWP and other stakeholders to develop eligibility criteria and establish the panel by September 2022.

Further information

18. For further information, contact Clare Davies (clare.davies@hefcw.ac.uk).

² *Wales Studies encompasses all fields of enquiry that explore the cultural, social, and physical features of Wales, in the full breadth of Wales's national and international contexts. It is research about Wales, for Wales...Wales Studies covers traditional areas such as history, politics, the Welsh language, sociology and literature, and also includes relevant areas from the sciences, archaeology, health, education, technology, arts, music and natural environments.*

Assessing the impact of our policies

19. We have carried out an impact assessment screening to help safeguard against discrimination and promote equality. We also considered the impact of policies on the Welsh language, and Welsh language provision within the HE sector in Wales and potential impacts towards the goals set out in the Well-Being of Future Generations (Wales) Act 2015 including our Well-Being Objectives. Contact equality@hefcw.ac.uk for more information about impact assessments.
20. This funding should have a positive impact on several of the goals of the Well-Being of Future Generations (Wales) Act 2015, including a Wales of vibrant culture and thriving Welsh language and a more equal Wales. The policy will also have positive impacts on treating the Welsh language no less favourably than English.

Summary of responses to the consultation on funding arrangement for Wales Studies publications

Introduction

1. A summary of the responses for each question and HEFCW's comments and response are provided below. Please note that while we have endeavoured to capture as many issues and concerns raised by each response as possible, some have been streamlined and summarised due to the sheer range of issues raised.

Q1. HEFCW proposes that funding be managed by the University of Wales Press; researchers in Wales would apply directly to the Press for funding. It is suggested that the funding for publications could be allocated by an expert panel, which could feature representation from the Press, experts in Wales Studies and other relevant stakeholders (such as the Learned Society of Wales). What are your views on this approach? Do you agree with the principle of returning funding to the Press? Do you agree that a Panel approach would be a useful means of assessing applications for funding?

There was broad support for the overall proposal, with the majority of submissions supporting the approach to return funding to UWP, though several raised potential concerns and caveats for HEFCW to consider and which are dealt with in more detail below. Of the responses that raised potential issues, two respondents disagreed with the proposal that UWP should manage the funding.

Almost all responses agreed with the panel approach, though suggestions were raised here on its potential make-up, and whether it should be pre-publication (to allocate funding) or post-publication (to review outputs). Many respondents noted the need for Welsh language to be adequately covered and suggested the inclusion of Coleg Cymraeg Cenedlaethol, as well as the Learned Society of Wales and the Books Council of Wales, to ensure good coverage. However, respondents also noted the need for such a panel to be both representative and expert, and to ensure institutional coverage.

A few respondents suggested that, rather than have a panel to allocate funding prior to publication, which they felt could make the process sluggish, a panel could meet to evaluate quality post-publication.

Concerns were raised about the potential monopolisation of Wales Studies by UWP at the expense of other academic presses, and particularly of other Welsh publishers, and even respondents who were in support of the proposal noted that this might be an issue. However, it was also noted by several respondents that UWP are the leading publisher in this area and that the stability of UWP was vital to support Wales Studies. Concerns were also raised over UWP's closeness to University of Wales/UWTSD, as it is a subsidiary company of UoW; this was seen to give an unfair advantage to one institution above others.

Annex A

It was also noted that the previous method of funding has allowed institutions to support outputs that may not necessarily fall under UWP's remit, and that this could have an impact on the scope of outputs available for submission to future research assessment exercises, for example in creative writing. Others noted that while academic books are intended to be the main publications supported by the fund, journals/journal articles related to Wales Studies and published via UWP could also be supported.

Several respondents stressed the need to support Welsh medium research further, and felt that the proposal would not do so. This was raised in the context of Welsh medium research on non-Wales Studies topics. It was also felt that UWP were too traditional in their approach to publishing (particularly around the issue of Open Access), and that this would negatively impact the future growth of Wales Studies.

HEFCW response:

While we are aware that this approach favours the role of UWP in the publication of Wales Studies research, we feel that HEFCW's remit to support HE in Wales (of which an academic press is a vital part) justifies our approach. Moreover, this approach ensures Welsh public money stays in Wales. The fortunes of other academic presses outside of Wales are not within the remit of HEFCW, nor is supporting the Welsh publishing industry as a whole, but the existence of a strong academic press in Wales is an important part of the health of the HE sector. Allocating funding via a regulated institution in the form of UWTSD provides additional security and we will require a published annual report to demonstrate how the funding has been used.

We agree that achieving the correct membership of the panel will be vital for the success of the scheme, both to ensure the quality of the publications supported and to facilitate transparency about funding decisions. While both pre- and post-publication approaches for the role of the panel have much to commend them, the central issue for HEFCW is the transparent and appropriate allocation of public funding and having the right balance of stakeholders on the panel to achieve this.

While we recognise the variety of REF-eligible outputs which may previously have been supported, this fund is targeted to support the publication of scholarly studies which do not usually attract other support. This could however include journal articles and we propose to allow this at the panel's discretion. Other Wales Studies books that do not fall under the remit of academic publishing can also receive support from elsewhere (such books would be eligible for, and do often receive, funding from the Books Council of Wales) but it is not within HEFCW's remit to support the development of other publishers in such a manner.

This funding has always been intended to support the publication, in both Welsh and English, of research related to the broad field of research of Wales Studies; this does not, and given the small amount of funding involved, cannot include Welsh medium research generally that is not related to Wales Studies. These books could legitimately seek financial support from other sources including the Books Council of Wales.

Q2. We are aware that UWP have not been the only recipient of this funding in the past. Our proposal is for University of Wales Press to receive the funding to manage Wales Studies publications. Does this have any unintended consequences?

Respondents raised concerns here that funding would no longer be available for other publishers and for other outputs, and that this would limit author choice. It was felt that such an approach would limit the diversity of outputs and thus be detrimental to the field and turn Wales Studies into a 'niche area with a niche publisher'. It was suggested that HEFCW consider the possibility of funding other publishers should the need arise. It was also noted that this could impact on current agreements and commitments in areas where UWP traditionally does not publish which could then negatively impact future REF submissions. Others noted that this while this would limit opportunities for engaging with other publishers, other outputs (such as creative writing) can potentially be supported by the Books Council of Wales, though this organisation is (like HEFCW) dependent on Welsh Government funding.

*However, several respondents noted that UWP were the leading publisher in this area, and had hitherto received most of the funding via the current arrangement and as such, it was felt by some that the impact on other presses would be minimal. It was also argued that this proposal was a good way of ensuring public money stayed in Wales. One institution felt that the unintended consequence of **not** returning the fund to UWP are far greater than any unintended consequences of doing so. Indeed, it was also argued by others that UWP, as the only University press committed to Wales Studies, should be awarded 'special protection'. It was noted that while there is a perceived risk that Wales Studies is restricted to a single publisher, UWP has the experience and expertise to deliver and that support for Wales Studies books by other publishers has never been consistent as they do not have the same level of commitment to the field (though it was felt more needed to be done to improve Open Access opportunities).*

It was noted that there may also be the potential for a conflict of interest in that UWP is a subsidiary of the University of Wales, however the role of the panel was cited as a means to ensure transparency and fairness.

HEFCW response:

HEFCW's remit is not to fund publishers; by funding Wales Studies via UWP HEFCW is delivering its remit to support the Welsh HE infrastructure by ensuring the existence of a vibrant academic press and is contributing to the support for the language and culture of Wales. As the leading publisher in this area, with a proven track record and access to the market, the University of Wales Press would appear to be the only legitimate publisher that can receive this funding from HEFCW. Other sources of funding are available to publishers (such as the Books Council of Wales) but the funding of other publishers is not in line with HEFCW's mission to support higher education in Wales.

Q3. As well as the need to continue support for Wales Studies, it has been noted that supporting the viability of the UWP is vitally important for the higher education sector in Wales. Does HEFCW's proposed approach to funding manage to achieve both aims?

The majority of respondents felt that this proposal achieved both aims of supporting both UWP and Wales Studies, though many felt that HEFCW should be more ambitious in terms of its Open Access requirements and in its funding to achieve these aims. It was recognised that this would be challenging and would require increased funding, but also that OA would be important to the Press's future success. Most respondents were very keen to see that the long-term viability of the Press is supported.

However, there were some that felt that Wales Studies research existed beyond the remit of UWP and thus supporting UWP only would hamper development in this area. One respondent was unconvinced by the need to support UWP and argued that academic publishing had changed much since the publication of the [Diamond](#) and [Hughes](#) reviews. There was also concern that the fate of Wales Studies was linked so closely to that of UWP and felt that supporting Wales Studies was not best achieved by supporting UWP.

Several respondents were concerned over the proposal's lack of explicit support for Welsh medium publications (as something separate from Wales Studies).

It was noted that the proposed approach will ensure that the UWP strengthens and develop further, and that the studies produced by the UWP considered to be from a highly commended publishing firm, but noted that both Wales Studies and UWP are vulnerable and therefore there was a risk in using one to bolster the other. It was noted by respondents that this proposal does not adequately 'future-proof' UWP and that compared to other presses in England it would continue to be underfunded.

Several respondents noted that supporting UWP would have a positive impact on the culture of Wales as it helps it to be seen as a nation of high quality academic publishing, and given UWP's history and its role in the Welsh HE sector, the proposal was an important step in safeguarding it. One respondent also noted that supporting the Press was crucial to Wales' 'cultural life as a whole'.

HEFCW response:

We note that the majority of respondents consider UWP a vital part of Wales' higher education sector, and makes an important contribution to the culture of Wales. We note that strengthening and supporting UWP is a concern for many, and that it was felt that this approach would help to achieve this. We fully recognise the need to develop UWP in terms of Open Access and we will monitor UWP's performance in the first years of this new funding arrangement in relation to this and in parallel with reviews of the level of funding.

Annex A

While it is true that UWP are not the sole publisher of Wales Studies outputs, respondents support the view that they are the most consistent in this field. The funding will be open to works published in both Welsh and English in the field of Welsh Studies, with neither language treated less favourably. However, this funding is for Wales Studies research and not research published in Welsh in all fields, which is a separate issue.

Q4. We would suggest that to qualify for funding, the author would have to be a researcher within or associated with a Welsh HEI. Does this approach leave any unaddressed gaps?

Many respondents noted that while they understood the rationale to support Wales-based researchers, the field of Wales Studies not only has an international reach but has been enabled by international scholarship. Several respondents noted that their preference would be on the quality and relevance of the research, rather than the location of the author, and argued that the Panel could keep an eye on the balance of contributions from outside of Wales, feeling that what is being proposed by HEFCW in this instance is excessively restrictive. It was suggested that restricting the funding to those researchers based in Wales would damage the perception of Wales Studies and reinforce ideas that it was parochial or insular. Respondents urged the need to be as inclusive as possible, with the potential for a funding window for external applicants and guidelines to prioritise Wales based researchers at competitive application rounds.

However, others agreed with the principle of being associated with a Welsh HEI but were concerned that the meaning of an 'association' with a Welsh HEI was too vague, arguing that postdoctoral researchers who completed their research in Wales may not necessarily still have that association with a Welsh HEI. Several respondents noted the importance of supporting ECRs through this funding, citing the Concordat to Support the Career Development of Researchers. There were also concerns raised about the eligibility for Emeritus professors, independent scholars and visiting scholars to Welsh HEIs.

One respondent noted that previous HEFCW funding rules (prior to institutional management of the fund) did provide space for authors not associated with Welsh HEIs, and suggested that limited provision within this funding could be made for scholars outside of Wales.

One respondent noted that HEFCW's remit as the funding council for Wales perhaps justified the approach taken to support Wales-based researchers and suggested that researchers beyond Wales 'would have all the other normal academic means at their disposal for ensuring publication of their work'.

It was suggested that HEFCW should publish clear criteria to ensure transparency and to ensure that Equality, Diversity and Inclusion expectations are met.

Annex A

HEFCW response:

While we appreciate the concerns that restricting support for Wales-based researchers may have consequences on international perceptions of Wales Studies, and on scholars based in institutions outside of Wales, we feel that due to the small amount of funding allocated to this fund, and our remit as the funding council for Wales, our funding should support researchers based in Wales. However, this will include the categories of independent scholars and researchers from the ECR community, who undertook their research in Wales, regardless of their current links to a Welsh HEI. The funding will also support Emeritus Professors from Welsh institutions working within the field. HEFCW will draft eligibility criteria to support this aspect of the proposal.

Q5. The funding has occasionally been used for non-publication uses, such as support for conferences and events related to the published book. We propose that the funding should be used for publications only. Are there any unintended consequences of this approach?

Several respondents reported that the funding has been used to support other important activities such as conferences; however, most respondents agreed that due to the small sum of money available, funding publications should be prioritised as this would allow a greater number of publications to be supported. Some suggested a ring-fenced amount could support other events, while others suggested that this could be picked up elsewhere, arguing that the funding available cannot sustainably support both publication and non-publication use.

One respondent argued that the funding arrangement as it stands currently helps to support their institutional commitment to the Welsh language, and an arrangement where funding was solely for publication use would have a negative impact on research in Welsh. The same respondent felt that UWP was also too traditional in its approach to publishing, and felt that this proposal did not take into account other research outputs, such as manga and film, that are eligible for the REF.

One respondent suggested that HEFCW could consider alternative funding streams to support the promotion of Wales Studies research, perhaps via the Learned Society of Wales.

An institution that, under the current arrangements, receives no funding for Wales Studies publications, welcomed the opportunity to apply for this funding and suggested that they would be happy to cover additional costs internally.

Annex A

HEFCW response:

We recognise that there are other outputs that would be recognised by a national research assessment, but publications occupy the largest amount of research outputs in the field. Non-traditional research outputs such as those referenced in the response noted above are not a cornerstone of Wales Studies research outputs and given the limited funding available, we propose to maintain a focus on academic publications. Any ring fence for example for events, would be for an amount too small to be meaningful and which would be burdensome to manage. We note that it was acknowledged by several respondents that there are other funding streams that could legitimately be used instead for conferences etc. (such as internal HEI funds), The conflation of Wales Studies and Welsh medium research is an unfortunate misunderstanding in this instance; this funding has always been for Wales Studies research in both Welsh and English, as discussed above.

Q6. Are there alternative models that could be considered?

The following alternatives were suggested:

- 1. To retain the current arrangement where the funding is passed on to Universities.*
- 2. That the Books Council for Wales administer the funds.*
- 3. That a body such as the Learned Society of Wales administers the fund.*
- 4. That the Coleg Cymraeg Cenedlaethol administer the fund.*
- 5. That distribution of funding to other publishing houses by percentage, based on the number of Wales Studies Publications published during a given time, be awarded.*

It was also suggested that HEFCW consider the Scottish model for the creation of an OA Press.

Of these, most respondents felt that the HEFCW proposal was preferable.

HEFCW response:

The possibility for Books Council for Wales to deliver the fund would be a significant infrastructure step change, and unnecessarily bureaucratic for this funding. It should also be noted that BCW, while referenced by respondents, did not submit a response to this consultation indicating that this is something they would be willing to administer.

The allocation of the fund to a single existing publisher with expertise in Wales Studies provides the most reliable way to ensure that researchers continue to be able to access the fund without unnecessary disruption. Allocations to multiple publishers will be bureaucratic and will create challenges for monitoring the quality of the publications supported by the fund.

Annex A

We agree that the Coleg Cymraeg Cenedlaethol need to be involved in the process to help ensure that proposals for publications in Welsh are considered no less favourably than those in English, and we have already spoken to them about taking a role on the Panel. The Learned Society for Wales will also be involved in the panel, and invited to chair it as an independent representative of the Welsh research community.

However, HEFCW will review how the new arrangement is working in practice, and will alter the funding arrangements if and when needed.

Q7. The level of funding has remained unchanged since 2011. What should HEFCW take into account in determining future levels of funding?

Nearly every respondent noted that the level of funding was an issue, and suggested funding be increased to support growth in this area. It was also noted by most respondents that Open Access demands would need to be considered, while it was noted that funding for arts and humanities research is frequently strained. It was noted that the importance of Welsh cultural studies to the nation needed to be valued in an increasingly market-driven environment.

Other factors raised that HEFCW should consider include the increase in publication costs since 2011, developments in the publishing industry and market size. HEFCW were also urged to consider making greater investment in Gold OA.

OA demands were a recurring concern among the respondents on this particular question, with respondents noting the need to support Gold OA requirements. Respondents also noted the rise in costs of publication since 2011 and the general lack of funding for the arts and humanities, as well as the need to support Welsh language publications.

HEFCW response:

We recognise the frustrations around the standstill figure that has been in place since 2011, and appreciate that publication costs have increased in that time. We are also acknowledge the need to align Wales Studies with developments in Open Access. We are also aware of the strain on funding for the arts and humanities more generally. We propose that the funding level will remain the same initially, but we will review use of fund to better understand the demand and we will work with UWP to improve for the volume of publications published OA.

Q8. Please provide any additional remarks that are not easily captured by the questions above, including any unintended consequences of this approach.

Annex A

A wide range of issues were raised here, but the recurring issues included:

- *Respondents noted that it was important to define the parameters of Wales Studies, and suggested that HEFCW adopt the definition of Wales Studies used by Learned Society of Wales.*
- *It was queried whether there needs to be separate panels for Welsh and English panels, or whether one bilingual panel would suffice.*
- *It was felt that while UWP should be supported, concerns were raised on the lack of support for other Welsh publishers that support academic works and REF-eligible outputs. It was also felt that this approach unfairly benefits monographs at the expense of other outputs.*
- *It was felt that there would be a lack of support for Welsh medium research.*
- *A need for clarity on inclusion of journals and journal articles.*
- *A need for longer-term funding assurance.*
- *It was suggested that the funding process be reviewed every 3-5 years*
- *It was suggested that UWP should be involved in setting criteria and other procedures (such as the need for an appeals process)*
- *Potential for REF results to be fed into this process.*
- *Potential detrimental impact on Welsh language research.*
- *Open Access/Open Science agenda*
- *Focus on UWP was seen as a lost opportunity to address better ways to support Wales Studies in a changing landscape*
- *It would be good at the very least to require UWP to allow Green open access via HEI repositories with appropriate and reasonable embargo periods and licences that allow re-use.*
- *The fund should also support publications in Welsh which are not necessarily about Wales*
- *HEFCW should support open access mandates and work with University of Wales Press to develop infrastructure which can deliver open access publication for both articles and monographs. There are successful open access publishing models in Wales (Cardiff University Press). There are also emerging collaborative approaches around this – for example, universities in Scotland have launched a collaborative open access press.*

Annex A

- *There were concerns that UWP publishing costs are high. It was suggested that HEFCW considers value for money in any future review of the proposed approach.*
- *It was noted that infrastructure to manage the fund, appoint the panel and the associated processes would need to be defined and implemented.*
- *Others used this opportunity to welcome the move and felt that this would be the fairest and most transparent way of managing this funding.*

HEFCW response:

We appreciate the range of issues and concerns raised by all respondents and while we have tried to address as many as possible in our modified response we cannot achieve all aims within the current level of funding. While we recognise the concerns over publication of research in the Welsh language in other fields, we reiterate that this fund is intended for the publication of Wales Studies research in both Welsh and English, and is not intended to be a Welsh medium research fund. We will ensure Coleg Cymraeg Cenedlaethol have a place on the panel alongside the Learned Society of Wales and Welsh HEIs to ensure there is a strong voice for Welsh medium outputs.

We recognise the need to be aware of the increasing turn towards Open Access publications, and have assurances from UWP that they are capable of delivering in this area. We will monitor the situation via annual reporting and close engagement with the Press and the independent panel to monitor the demand for this funding and the efficiency of the model. We are open to review and modify the arrangement as needs be.

We appreciate the opportunity to better define Wales Studies, and acknowledge that our previous definition for publications related to the 'history, literature and culture of Wales' may have been interpreted as restrictive. We therefore intend to adopt the definition of Wales Studies as suggested by the Learned Society of Wales and trust that this be viewed as a step forward for the development of Wales Studies research.

We will publish criteria regarding eligibility and assist in the establishment of the panel and its procedures to assess applications.

i. What positive or adverse effects will the proposals have on:

- opportunities for persons to use the Welsh language
- treating the Welsh language no less favourably than the English language?

ii. How could the proposals for the new funding method be changed to increase positive effects, or decrease adverse effects on:

- opportunities for persons to use the Welsh language

Annex A

	<ul style="list-style-type: none"> • treating the Welsh language no less favourably than the English language?
<p><i>While many respondents felt that this approach would have a positive impact on opportunities to use the Welsh language and in treating the Welsh language no less favourably than English, concerns were raised that in areas of research not supported by the remit of this fund, this policy would have an adverse effect. Respondents noted the need to further support Welsh medium outputs, in consultation with the Coleg Cymraeg Cenedlaethol.</i></p> <p><i>However, others noted that the policy would have a positive impact on the Welsh language by ensuring funding is received by a bilingual publisher who treats Welsh and English equally, and who have a number of Welsh-speaking staff who understand the Welsh language context.</i></p> <p><i>Potential improvements to this policy included ring-fencing a percentage of the funding for Welsh-medium outputs and broadening the remit of the funding to include other outputs.</i></p> <p><i>It was noted that an impact assessment should be carried out and reviewed on a cyclical basis.</i></p> <p><i>Respondents noted the need to clarify how Welsh-language authors would be encouraged to make use of this fund and how Welsh-language publications would be considered by the panel.</i></p>	
<p>HEFCW response:</p> <p><i>We are pleased that respondents noted the positive impacts that this funding will have on opportunities to use the Welsh language and in treating Welsh no less favourably than English; we believe this funding, which is for Welsh and English publications, will continue to support research on Wales Studies in both languages.</i></p> <p><i>HEFCW has carried out an impact assessment and this will be reviewed at regular intervals.</i></p>	
<p>Do the proposals for the fund have any positive or negative impacts or unintended consequences in terms of equality and diversity and the Well-being of Future Generations (Wales) Act’s seven wellbeing goals, Sustainable Development Principle and five ways of working?</p>	
<p><i>Respondents noted the positive impacts that the funding would have on not only societal wellbeing, but also by opening up the funding to researchers previously excluded from the fund, the policy would contribute to the goal of a more equal Wales. It also supports the goal of ‘a Wales of vibrant culture and thriving Welsh</i></p>	

Annex A

language'. Developing OA was also noted to have a democratising effect on making research accessible.

However, it was noted that the policy as proposed may also have a negative impact if wider support for Welsh medium publications is not implemented. It was noted that an impact assessment should be carried out and reviewed.

HEFCW response:

We were pleased that respondents felt that this would have positive impacts with regard to the goals and ways of working of the Well-being of Future Generations (Wales) Act, particularly in improving access to the funding available and in contributing to the cultures of Wales in both English and Welsh. HEFCW has carried out an impact assessment and this will be reviewed at regular intervals.