

RESPONSIBLE CONDUCT OF RESEARCH



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| Effective Date | October 28, 2021 | Policy Type | Academic |
| Responsibility | Vice-President Academic and Research | Related Policies | Tri-Agency Framework: Responsible Conduct of Research Agreement on the Administration of Agency Grants and Awards by Research Institutions |
| Approval Authority | Board of Governors | Review Schedule | Every 5 years |

1. **Policy Statement:** GPRC maintains high standards for the responsible conduct of research. As such, GPRC requires a robust procedure for preventing breaches of conduct, reporting ethical breaches, and investigating allegations thoroughly and impartially.
2. **Scope:** This policy applies to all GPRC Employees, Students, and third parties engaged in research, including research administrators.
3. **Reason for Policy:** As a research institution committed to high standards of ethical conduct, GPRC is signatory to the *Tri-Agency Framework: Responsible Conduct of Research* (RCR Framework) and must adhere to its principles. The contents of this policy closely mirror terms outlined in the RCR Framework and fulfills many of our compliance obligations. Failure to adhere to guidelines for responsible conduct could result in significant risk to the institution, researcher, and all other parties affected by the research, including risk to reputation and future ability to hold research funds and engage in research.
4. **Definitions:**

Breach: Failure to comply with any Agency policy throughout the life cycle of a research project – from application for funding to the conduct of the research and the dissemination of research results.

Breaches of Tri-Agency Research Integrity Policy:

- **Destruction of research records:** The destruction of one’s own or another’s research data or records to specifically avoid the detection of wrongdoing or in contravention of the applicable funding agreement, institutional policy and/or laws, regulations and professional or disciplinary standards.
- **Fabrication:** Making up data, source material, methodologies or findings, including graphs and images.
- **Falsification:** Manipulating, changing, or omitting data, source material, methodologies or findings, including graphs and images, without acknowledgement and which results in inaccurate findings or conclusions
- **Inadequate acknowledgement:** Failure to appropriately recognize contributors.
- **Invalid authorship:** Inaccurate attribution of authorship, including attribution of authorship to persons other than those who have made a substantial contribution to, and who accept responsibility for, the contents of a publication or document.
- **Mismanagement of conflict of interest:** Failure to appropriately identify and address any real, potential or perceived conflict of interest, in accordance with GPRC’s policy on conflict of interest in research, preventing one or more of the objectives in the RCR Framework from being met.

- **Plagiarism:** Presenting and using another's published or unpublished work, including theories, concepts, data, source material, methodologies or findings, including graphs and images, as one's own, without appropriate referencing and, if required, without permission.
- **Redundant publication or self-plagiarism:** The re-publication of one's own previously published work or part thereof, including data, in any language, without adequate acknowledgement of the source, or justification.

Misrepresentation in an Agency Application or Related Document

- Providing incomplete, inaccurate, or false information in a grant or award application or related document, such as a letter of support or a progress report.
- Applying for and/or holding an Agency award when deemed ineligible by NSERC, SSHRC, CIHR, or any other research funding organization world-wide for reasons of breach of responsible conduct of research policies such as ethics, integrity, or financial management policies.
- Listing of co-applicants, collaborators or partners without their agreement.

Mismanagement of grants or award funds: Using grant or award funds for purposes inconsistent with the policies of the agencies; misappropriating grants and award funds; contravening Agency financial policies, namely the Tri-Agency Financial Administration Guide, Agency grants, and award guides; or providing incomplete, inaccurate or false information on the documentation for expenditures from grant or award accounts.

Breach of Agency Policies or Requirements for Certain Types of Research: Failing to meet Agency policy requirements or to comply with relevant policies, laws, or regulations for the conduct of certain types of research activities; failing to obtain appropriate approvals, permits, or certifications before conducting these activities.

Breach of Agency Review Process

- Non-compliance with the Conflict of Interest and Confidentiality Policy of the Federal Research Funding Organizations (NSERC, SSHRC, and CIHR)
- Participating in an Agency review process while under investigation

Complainant: Individual alleging a breach has taken place. Complainants may be directly or indirectly involved in the research (e.g. as participants or collaborators) or they may be other concerned members of the public or GPRC community.

Employee or staff: Any person who is employed by GPRC or who provides services to GPRC under an employment contract.

Research: An undertaking intended to extend knowledge through disciplined inquiry or systematic investigation. All GPRC researchers must comply with the *Tri-Agency Framework*, not just researchers that receive Tri-Agency funding.

Responsible Conduct of Research (RCR): In this policy, research conducted in a manner compliant with the *Tri-Agency Framework, Responsible Conduct of Research*.

Student: Any person registered in a GPRC credit course.

Tri-Council or Tri-Agency: Collective term that describes the federation of all three Agencies.

5. The Policy:

5.1 Confidentiality

- 5.1.1 Upon receiving an allegation of breach of responsible conduct, GPRC shall maintain strict confidentiality of the complainant(s) and respondent(s) throughout the investigation process unless compelled to break confidentiality by law or Tri-Agency policy.

5.2 Receiving allegations

- 5.2.1 Inquiries, allegations of breaches, and other information related to allegations shall be directed in writing to the Director, Research and Innovation or designate.
- 5.2.2 Any person may register a confidential report or inquiry concerning a breach of responsible conduct, regardless of relationship to the institution, the researcher, or the research project.
- 5.2.3 Anonymous allegations will be considered if accompanied by sufficient information to enable an investigation without the need for further information from the Complainant.
- 5.2.4 Upon receipt of an allegation, GPRC may independently or at an Agency's request take immediate action to protect research funds (e.g., by freezing a research spending account).
- 5.2.5 Individuals making an allegation in good faith or providing information related to an allegation will be protected to the extent possible from reprisals in a manner consistent with GPRC policies, Tri-Council guidelines, and relevant legislation.
- 5.2.6 When an allegation concerns conduct that has taken place at another institution, GPRC will contact the other institution to determine which is best placed to handle the allegation.

5.3 Investigating Allegations

- 5.3.1 GPRC will engage in an initial inquiry process to establish whether an allegation is credible and an investigation is required. This will usually involve consultation between the Vice-President, Academic and Research; Director, Research and Innovation; and the divisional Dean(s)/Director(s) of the Complainant and/or Respondent.
- 5.3.2 If an investigation process is warranted, the Respondent will be notified of the allegation(s) against them and the investigation will be initiated.
 - Instances of alleged breaches may be resolvable through informal consultation between the complainant and the respondent.
 - If a breach is determined to have taken place, the respondent may appeal the decision to the Vice-President Academic and Research, who may decide to proceed to the next stage of investigation.
- 5.3.3 If the allegation is not resolved through initial inquiry or informal consultation, an ad hoc Research Misconduct investigation committee will be assembled.
 - Committee members will be appointed by the Director, Research and Innovation.
 - The investigation committee shall include up to five members who have the necessary expertise and who are without conflict of interest, whether real or apparent. The committee must include at least one external member who has no current affiliation with the institution.
 - The committee may include members in good standing of the Research Planning Committee (RPC) and the Research Ethics Board (REB).
 - Should any person involved in the investigation find him or herself in a real or apparent conflict of interest at any point, he or she must disclose the conflict and recuse him or herself from the investigation process immediately and an appropriate replacement will be appointed by the committee.
- 5.3.4 The investigation committee will consider documented evidence, interviews, and statements brought forward by the complainant, respondent, or any other person who may have information related to the allegation.
- 5.3.5 The investigation committee shall complete their investigation, report on findings, recommend recourse, and communicate results to the Director, Research and Innovation as well as the parties involved within a reasonable timeframe of commencing the investigation (at the latest, within six months of when the allegation was first received by GPRC).
- 5.3.6 The Director, Research and Innovation will consider the committee's recommendation, taking into account intent and severity of the breach, and make an ultimate ruling on recourse.

5.4 Accountability

- 5.4.1 Following the committee decision, all affected parties will be notified in a timely manner of the decision and of any recourse to be taken by GPRC.

5.4.2 Should allegations be determined to be unfounded, every reasonable effort will be made by GPRC to protect or restore the reputation of those wrongly subjected to an allegation.

5.4.3 Depending on the severity of the offense and at the discretion of the College, a researcher found to be in breach may be...

- Required to return research funds and cease research activities;
- Required to surrender or destroy all research data whose collection was made possible by the Breach
- Suspended from applying for Tri-Council funds, either indefinitely or for a set period of time
- Issued a letter of reprimand
- Required to issue a formal apology
- Suspended without pay
- Terminated from their position at the College

5.5 Institutional Reporting and Follow-Up

5.5.1 Pursuant to Section 4.4 of the Tri-Agency Framework, the College must advise the Secretariat on RCR matters (SRCR) of any allegations related to activities funded by the Agency, even if the investigation does not proceed beyond its initial stages.

5.5.2 GPRC must also provide a full and detailed report on all investigations annually to the SRCR.

5.5.3 Reports for SRCR should include all information outlined in 4.4.c of the Framework (or in relevant sections of any successor Tri-Agency framework, policy, or guidelines).

6 Revision history:

6.1 Revised March 2021.

6.2 Recommended by Academic Council: October 14, 2021

6.3 Approved by Board of Governors: October 28, 2021