



June 18th, 2021

Ms. Susan Zimmerman
Executive Director
Secretariat for Responsible Conduct of Research
350 Albert St.
Ottawa ON K1A 1H5

Dear Ms. Zimmerman,

Thank you very much for the opportunity to provide input to the latest consultation on the RCR Framework. In summary, the University of British Columbia sees the proposed revisions as broadly helpful, particularly to the extent that they highlight the importance of a strong research culture generally and effective engagement with trainees specifically.

We note the Panel's decision not to use this consultation as an opportunity to develop guidance on the responsible conduct of research with Indigenous peoples and/or Indigenous lands, and are pleased to know that there are plans to develop this guidance separately. UBC's campuses sit on the traditional, ancestral, and unceded territory of the Musqueam, Tsleil-Waututh and Squamish Nations, and the unceded territory of the Syilx (Okanagan) Peoples. Relationships with First Nations communities where we live and work, and with whom we share several important research engagements are of paramount importance to the University as we work towards our goal of becoming a leading voice in the implementation of Indigenous peoples' rights. We look forward to participating in the Panel's discussions about this important topic.

In responding to the current consultation, I will limit my remarks to proposed revisions that the University has specific comments or questions about.

1) *Section 2: Responsibilities of Researchers: New Responsibility*

The University acknowledges that systemic racism, unconscious bias, and issues of positionality and power can have a negative impact on oversight, training, and fair treatment in research. While we have a number of policies that describe the University's expectations for conduct and responses to instances of alleged misconduct, it is a valuable addition to set similar expectations in the RCR Framework.

The University has the following suggestions related to this new section:

- a. We recommend that where Institutions have multiple policies and procedures to respond to instances of misconduct imagined in this new responsibility, that it is the institution's discretion under which policy a relevant allegation will be considered.
- b. We recommend that the concept of "fair treatment in peer review" be defined in the context of the RCR Framework. It is presumably not the intent, for example, to extend the scope of that requirement to internal peer review of tenure and promotion files, or the review of internal funding competitions.



- c. We recommend defining “healthy” in the context of the research environment in the Glossary of the Framework.

2) *Section 4.2: Promoting Responsible Conduct of Research: New Responsibility for Institutions*

Similar to the new responsibility for researchers above, the University strongly supports new language in the Framework that strengthens and clarifies expectations around research culture. We recommend an additional statement in the preamble to Section 4.2 to explicitly acknowledge the presence and impact of dynamics that may harm research culture, such as positionality, power dynamics, systemic racism, unconscious bias, and so on. As mentioned above, the University also recommends language to be clear that where a particular allegation could be relevant to more than one institutional policy, that it is the University’s discretion to decide the most appropriate mechanism to consider that allegation.

3) *Appendix B (Glossary): New Definition*

We welcome the addition of a definition of the responsible conduct of research, and will consider whether and to include that language in the University’s scholarly integrity policy.

Thank you again for the opportunity to participate both in the initial planning for this consultation, and in the formal consultation itself. The University genuinely appreciates the important leadership that the Secretariat provides in ensuring Canadian institutions can reflect best practices in the responsible conduct of research. I understand that the Panel intends to share responses to the consultation publicly, and you have my permission to do so with this correspondence.

Sincerely,

A handwritten signature in blue ink that reads "Gail Murphy".

Gail Murphy, PhD, FRSC
Vice-President Research & Innovation