

University of Calgary's Response to the  
Proposed Revisions to the  
*Tri-Agency Framework: Responsible Conduct of Research (2016)*

Current RCR Framework (2016) Text	Proposed text (New text is underlined; deleted text is in strike-through)	Rationale for proposed revision
<b>2 Responsibilities of Researchers</b>		
New responsibility	<p><u>2.7 Appropriate oversight, training and fair treatment in the conduct of research</u></p> <p><u>Researchers should familiarize themselves with principles of responsible conduct of research and foster the application of these principles in their research environment. Researchers with supervisory roles should provide adequate oversight of, and training to, their trainees and staff in responsible conduct of research. Fair treatment in peer review, in performance assessment and in resolving intellectual disagreements, is essential for a healthy research environment.</u></p> <p>- The last paragraph is vague and should be removed. The matters relating to peer review in section 2.6 are narrowly defined, and the concept of "fair treatment" adds a new element which is highly subjective. Further it is not clear what constitutes an "intellectual disagreement".</p>	<p>Although institutions may already have separate policies that address academic supervision there are elements to supervision in the context of research that are distinct and should be considered an integral part of any RCR policy.</p> <p>This proposed new responsibility clearly demonstrates that responsible supervision and promotion of a healthy research environment are elements of responsible research conduct.</p> <p>Incorporating responsibilities related to fostering a culture of RCR, providing appropriate oversight and ensuring fair treatment into the RCR Framework would allow institutions to conduct inquiries and investigations, and for the Agencies to potentially impose a recourse, when these issues have the potential to negatively impact that quality of research conducted under their auspices.</p>

<b>3.1.1 Breach of Tri-Agency Research Integrity Policy</b>		
<p>New breach</p>	<p>a. <u>Lack of rigour</u></p> <p><u>Lack of scholarly and scientific rigour in proposing and performing research; in recording, analyzing, and interpreting data; and in reporting and publishing data and findings.</u></p> <p>- This is a concern because it seems to imply that the failure to publish findings is an indicator of breach of research integrity.  - In addition, what constitutes “rigour” is highly subjective and not easily defined for the purposes of identifying a breach. Components of “rigour” may also change from discipline to discipline. It’s worth noting that the other concepts comprising Research Integrity in s. 2.1.2 are based in matters of fact which can be (relatively) easily substantiated.</p>	<p>This proposed new breach is to correspond to an existing responsibility described in Article 2.1.2 (Rigour) and defines what constitutes “Lack of rigour”.</p>
<p>b. Falsification</p> <p>Manipulating, changing, or omitting data, source material, methodologies or findings, including graphs and images, without acknowledgement and which results in inaccurate findings or conclusions.</p>	<p>b. Falsification</p> <p>Manipulating, changing, or omitting data, source material, methodologies or findings, including graphs and images, without acknowledgement, <u>such that the research is not accurately represented in the research record.</u> <del>and which results in inaccurate findings or conclusions.</del></p> <p>- Acceptable.</p>	<p>For a breach of falsification to be confirmed under the current RCR Framework (2016) definition, the manipulation must result in inaccurate findings or conclusions.</p> <p>This proposed revision broadens the definition to include any falsification that impacts the research record, regardless of whether it results in inaccurate findings or conclusions, is more consistent with the objective of RCR.</p>

<p>c. Destruction of research records</p> <p>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.</p>	<p>c. Destruction of research records</p> <p>The destruction of one’s own or another’s research data or records <del>data or records to specifically avoid the detection of wrongdoing</del> or in contravention of the applicable funding agreement, institutional policy and/or laws, regulations and professional or disciplinary standards. <b>This also includes the destruction of data or records to avoid the detection of wrongdoing.</b></p> <p>- This is an improvement. The previous language implied intentionality (“to specifically avoid”) which would be very difficult to fairly substantiate.</p>	<p>This change is proposed to improve clarity. The current wording of the definition implies that the purpose of destroying research records is primarily to avoid the detection of wrongdoing. The proposed revision of splitting the definition into two separate thoughts removes that implication.</p>
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4.2 Promoting Responsible Conduct of Research		
<p>New responsibility for institutions</p>	<p>d. <b>Ensuring that their researchers comply</b> with <u>institutional policies that may impact the responsible conduct of research, in particular those policies that relate to providing appropriate oversight, adequate training, and fair treatment to individuals in their research team.</u> <b>Institutions should also be proactive in supporting a healthy research environment.</b></p> <p>- This change is problematic for a number of reasons. First, as an institution, we cannot “ensure that...researchers comply”, all we can do is set expectations and have consequences</p>	<p>This is a new institutional responsibility for fostering a culture of responsible conduct of research and for ensuring appropriate oversight and fair treatment in research. This addition will give institutions clearer authority to conduct inquiries and investigations when these issues have the potential to negatively impact that quality of research.</p>

	<p>for failure to comply. Anything more may create issues for our faculty bargaining association.</p> <ul style="list-style-type: none"> <li>- As an alternative, we suggest that institutions could be asked to “support researchers in complying”. This appears to be an emerging standard and is often a condition in US funding agreements.</li> <li>- Finally, the last sentence is vague and should be deleted.</li> </ul>	
<b>4.3.4 Investigating Allegations</b>		
<p>a. An initial inquiry process to establish whether an allegation is responsible and if an investigation is required.</p>	<p>a. An initial inquiry process to establish whether an allegation is responsible and if an investigation is required. <u>An inquiry may be conducted by <b>one or more individuals</b>. This could include the institution’s designated RCR contact and/or other individuals qualified to assess whether the allegation is responsible. The individual(s) conducting an inquiry should be <b>without conflict of interest</b>, whether real, potential or perceived.</u></p> <ul style="list-style-type: none"> <li>- This section should be reworked.</li> <li>- The Framework currently stipulates that a Committee be formed. It is a reasonable to revise s.4.3.4(c) to make it clear that a single authority may be used in the alternative to a Committee.</li> <li>- The reference to absence of Conflict of Interest is not necessary and is already included in s. 4.3.4(c).</li> </ul>	<p>This proposed revision would add guidance on who and how many people should be involved in conducting an inquiry.</p>

<p>d. Reasonable timelines for completing an inquiry, completing an investigation, reporting the findings, making a decision on what action should be taken, and communicating with the parties involved. The timelines must be within the reporting timeframes outlined in Article 4.4.</p>	<p>d. Reasonable timelines for completing an inquiry, completing an investigation, reporting the findings, making a decision on what action should be taken, and communicating with the <b>affected</b> parties <del>involved</del>. The timelines must be within the reporting timeframes outlined in Article 4.4.</p> <p>- Acceptable.</p>	<p>This change is proposed to be consistent with the term “affected” used in Article 4.3.6(a).</p>
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<b>4.3.6 Accountability</b>		
<p>a. A procedure, which takes into account applicable privacy laws and regulations, to inform all affected parties, in a timely manner, of the decision reached by the investigation committee and of any recourse to be taken by the institution.</p>	<p>a. A procedure, <del>which takes into account applicable privacy laws and regulations,</del> to <u>provide</u> inform all affected parties, <del>in a timely manner, of the decision reached by the investigation committee and of any recourse to be taken by the institution.</del> <u>with relevant information about the process and outcome of the inquiry and investigation. Institutions are encouraged to disclose information on the measures that they may be taking to improve their processes including training, as a result of the allegation.</u> Information should be <u>provided in a manner consistent with the privacy legislation applicable to the institution(s) that are conducting the inquiry or investigation. Recourse against a Respondent should only be shared with the Respondent.</u></p> <p>- The language regarding improvement of processes does not belong in s. 4.3.6 relating to Accountability. This is a discretionary</p>	<p>This proposed revision would add guidance on what institutions should consider disclosing at the end of an RCR process.</p>

	<p>option and if it must be referenced perhaps it should be included in section 4.5 dealing with “Promoting Awareness and Education”.</p> <p>- With regard to the last sentence, this does not reflect actual practice, specifically our practice of sharing information with Research Ethics Boards. This should be dropped entirely and/or left to the discretion of each institution.</p>	
<p>b. A provision for allegations determined to be unfounded that every effort will be made by the institution to protect or restore the reputation of those wrongly subjected to an allegation.</p>	<p>b. A provision for allegations determined to be unfounded that every effort will be made by the institution to protect or restore the reputation of those wrongly subjected to an <u>unsubstantiated</u> allegation.</p> <p>- It would be preferable if this was revised to refer to “all reasonable efforts will be made...”. “Every effort” is a very high standard and implies no expense should be spared. Institutions have limited financial resources and the costs associated with making “every effort” may well exceed the benefits attained. This would likely be</p>	<p>This proposed revision would better align the English language text with the French version of the article.</p> <p>The change also more appropriately places emphasis on the allegation, not the person wrongly accused.</p>

	viewed as a waste of financial resources by both internal and external stakeholders.	
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APPENDIX B: Glossary		
<p>Responsible allegation</p> <p>An allegation that is based on facts which have not been the subject of a previous investigation, and which falls within Section 3 of this RCR Framework.</p>	<p>Responsible allegation</p> <p>An allegation: 1) that is based on facts which have not been the subject of a previous investigation; 2) <del>and which that</del> falls within Sections 2 and 3 of this RCR Framework; 3) <u>which would have constituted a breach at the time the alleged breach occurred</u>; and 4) <u>for which the institution has direct access to the evidence necessary to corroborate or dismiss the allegation.</u></p> <p>- This change should be rejected., The concept of “responsible allegation” is analogous to the concept of a “prima facie” case in law. A prima facie case means that there is enough information available which, if proved and not rebutted, might constitute a breach. The language proposed here imposes the requirement to delve further into the allegation and conclude conclusively that preliminary information constitutes a breach, when, in fact, the information may support a</p>	<p>This proposed revision adds criteria for institutions to consider when deciding whether to dismiss or pursue an allegation.</p> <p>It also clarifies that institutions are responsible for considering responsibilities as listed in Section 2, not solely breaches in Section 3, when assessing whether allegations are responsible.</p>

	<p>number of conclusions. The Investigation Committee is responsible for determining whether the evidence gathered over the course of an investigation actually constitutes a breach.</p>	
<p>New definition</p>	<p><u>Responsible Conduct of Research (RCR)</u><sup>1</sup></p> <p><u>The behavior expected of anyone who conducts research activities throughout the life cycle of a research project (i.e., from the formulation of the research question, through the design, conduct and analysis of the research, to its reporting, publication and dissemination). It involves the awareness and application of established professional norms, as well as values and ethical principles that are essential in the performance of all activities related to scholarly research. These values include honesty, fairness, trust, accountability, and openness.</u></p>	<p>This proposed addition addresses the absence of a definition of RCR in the current RCR Framework.</p>

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<sup>1</sup> This proposed definition is based on text drawn from the following sources: The Hong Kong Principles for assessing researchers: Fostering research integrity (2020), 6th World Conference on Research Integrity (June 2-5, 2019); the U.S. National Institutes of Health (NIH) definition of RCR (2009); and CCA (2010). Honesty, Accountability and Trust: Fostering Research Integrity in Canada. Ottawa: Council of Canadian Academies.



	<ul style="list-style-type: none"><li>- It's not clear what purpose is served by this definition. The fact is that the entire Framework is devoted to describing these issues and we are not confident it can be boiled down a single definition as described here.</li><li>- We recommend that the Secretariat put forward a conclusive argument supporting the need for this definition.</li></ul>	
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