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Sent: Monday, June 7, 2021 2:31 PM
To: secretariat (SRCR/SCRR) <secretariat@srcr-scrr.gc.ca>
Subject: RCR consultation

To the Secretariat:

I am pleased to participate in the consultation process for the Proposed Revisions to the Tri-Agency Framework: Responsible Conduct of Research. As a member of my institution's Research Misconduct Committee, I have first-hand experience of these investigations.

1. I am very pleased to see that fostering RCR principles in research groups is highlighted. One of the most common misconduct problems is repeated individual offenses by different trainees in the same lab. The root problem of these are supervision practices that are either conducive to or promote misconduct. However, because allegations are considered separately, there is a lack of accountability and effectively no mechanism for investigating or imposing consequences for creating a poor research environment (in part because by all of our other criteria—papers, funding, seniority—these are often considered “excellent” research environments). If anything, I would like to see more tools in this policy to address patterns of misconduct arising from inadequate supervision or attitudes/pressure from PIs that enable or reward poor research practice and fraud.
2. Research misconduct is as common in Canada as anywhere, however it is shrouded in opacity and lack of accountability. The disconnect between the number of cases where misconduct is found and the number of public disclosures is frankly embarrassing. The lack of transparency erodes the reputation of Canadian science, fails to deter misconduct, harms whistleblowers, and undermines the difficult work done by those of us who conduct these investigations. It is particularly glaring when misconduct investigations arise from issues that are already public. To investigate public allegations and then refuse to publicly address their veracity (citing “privacy concerns” that do not in fact exist) makes the situation much worse for the integrity of our institutions, our ability to deter misconduct, and our responsibility to help Respondents address harm to their reputation done by spurious but publicly-available allegations.

With that as context, there is still an overemphasis in this document on privacy. Universities are obsessed with avoiding liability. Given any potential out (like unspecified “privacy concerns”), institutions will always choose not to disclose, even when they have the right or obligation to do so. Everyone receiving Tri-council funds signs a document waiving their privacy rights with respect to findings of misconduct. As scientists entrusted with public funds, this is as it should be. The fact that consent to disclose has been given by all funded PIs should be emphasized in this document and in all decisions related to disclosure. Disclosure should be the rule, not the extremely rare exception that it currently is. I can't emphasize enough how harmful this apparent complacency is to our international standing and the training environments we offer to our students and postdocs.

Best,
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