

From: Michael Hoffman <michael.hoffman@utoronto.ca>
Sent: Friday, July 2, 2021 11:56 AM
To: secretariat (SRCR/SCRR) <secretariat@srcr-scrr.gc.ca>
Cc: Beckett, Brian <Brian.Beckett@uhnresearch.ca>
Subject: RCR Framework consultation

Dear Panel on Responsible Conduct of Research:

Thank you for consulting on the revisions to the framework on Responsible Conduct of Research. The proposed revisions seem sensible as do the set of responsibilities for researchers, in principle.

In practice, researchers and the public have very little information to know that the framework on Responsible Conduct of Research is enforced. Despite holding the ability to publicly disclose details in case of "serious breach of Agency policy", this disclosure has only happened once in 2016. Given the number of cases seen in your annual reports involving confirmed breaches of falsification, fabrication, and mismanagement of grant funds, the lack of public disclosures seems remarkable and does not contribute to confidence about the responsible conduct of research in Canada. The lack of widespread knowledge of the results of RCR sanctions means that they have no deterrent effect. It also leaves researchers who have committed serious misconduct free to escape accountability by moving to positions outside the Canadian academic research system, enabling them to commit misconduct and fraud elsewhere.

I propose the following changes to increase public and research community confidence in the responsible conduct of research in Canada, and increase the deterrent and educational effects of the existing policies:

1. Change the scenario in which public disclosure of a breach occurs. Instead of "In cases of a serious breach of Agency policy, as determined by the Agency President", change the framework to disclose the breach publicly in all cases that are sanctioned with at least two years of ineligibility to hold or apply for funding, except in those cases where the Agency President determines exceptional circumstances mean the disclosure should not be made. The default should be disclosure in these serious cases, rather than asking Agency Presidents to make an additional determination that disclosure should occur, which may happen rarely and inconsistently.
2. Include as a formal part of the framework the anonymized file summaries available at https://rcr.ethics.gc.ca/eng/education_summaries-dossiers.html, in both the section on "Accountability and Reporting" and in Appendix A, "Summary of Process". The Summary of Process diagram should describe your current practice, indicating that either public disclosure or reporting in an anonymized file summary will occur after the final decision is communicated.
3. Increase the dissemination of outcomes in the case of breaches by including public disclosures in agency newsletters to researchers as they occur, and bundles of anonymous file summaries as they are released. This would mirror the example of the U.S. National Institutes of Health where misconduct reports occur in the NIH Guide to Grants and Contracts, providing what is probably

the most important channel for education about and deterrence of misconduct by funded researchers.

Additionally I note that while the Panel indicated its intention to disclose further anonymized file summaries in "three-year installments", there is nothing beyond March 31, 2016—it has been more than five years. I encourage you to post the next three-year installment soon and to make researchers aware of it through Agency newsletters.

Sincerely yours,

Michael M. Hoffman, PhD

Senior Scientist, Princess Margaret Cancer Centre

Associate Professor, Department of Medical Biophysics, University of Toronto

Associate Professor, Department of Computer Science, University of Toronto

Faculty Affiliate, Vector Institute

Province: Ontario

Affiliation: hospital

Capacity in which you are submitting the comments: researcher

Your main discipline, if applicable: Biomedical