

RCR Framework (2016) – Feedback on Proposed Revisions for Public Consultation

Demographic data:

- Province: Ontario
- Affiliation: University
- Capacity in which the comments are submitted: Research integrity officer/RCR contact
- Main discipline, if applicable: Behavioural Sciences, Biomedical, Engineering, Health Sciences, Humanities, Interdisciplinary, Natural Sciences, Social Sciences, other

2 Responsibilities of Researchers	Feedback
<p>2.7 New Responsibility: <u>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>This is an excellent addition and agree that it will foster an environment of responsibility. It would be helpful to obtain resources that could be readily shared with researchers on the principles of RCR so that the “training” of trainees is consistent across faculty members and institutions. These resources need to be readily accessible to all (web link, PDF downloads). Possible to produce a module/tutorials (e.g., similar to ethics and unconscious bias training).</p>
3.1.1 Breach of Tri-Agency Research Integrity Policy	
<p>New Breach: <u>a. 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>The inclusion of this new breach to align with 2.1.2 makes good sense.</p> <p>This appears to be more subjective. It would be helpful for the Secretariat to provide standards and criteria. If the Secretariat could provide some indication about how this differs from plagiarism, falsification and fabrication, it would be helpful.</p>
<p>b. Falsification. 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, and which results in inaccurate findings or conclusions.</u></p>	<p>This is an excellent change and we concur that this revised wording better encompasses any change or manipulation of data, regardless of how it affects the results.</p>
<p>C. Destruction of research records</p>	<p>The removal of the phrase is a good change as it opens it up more broadly to state</p>

<p>The destruction of one’s own or another’s research data or records 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. <u>This also includes the destruction of data or records to avoid the detection of wrongdoing.</u></p>	<p>destruction of research records in contravention of agreements, policies and includes for purposes of wrongdoing (but not specifically for this purpose).</p>
<p>4.2 Promoting Responsible Conduct of Research</p>	
<p>New Responsibility: <u>Ensuring that institution’s researchers comply with policies that may impact RCR – i.e., in particular those policies that relate to providing appropriate oversight, adequate training and fair treatment to individuals in their research team. Institutions should be proactive in supporting a healthy research environment.</u></p> <p>Rationale: 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>This will be a hard responsibility for the Secretariat to oversee. Will the Secretariat provide seminar material for institutions to access? Perhaps a certification program or making Tri-Agency funding contingent upon successful completion of a RCR seminar or tutorial?</p>
<p>4.3.4 Investigating Allegations</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 one or more individuals. 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 without conflict of interest, whether real, potential or perceived.</u></p>	<p>This is a good addition as it provides additional clarity on who and how many people can be involved in the Inquiry phase.</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 <u>affected</u> parties <u>involved</u>. The timelines must be within the reporting timeframes outlined in Article 4.4.</p>	<p>Is there a need to define what is meant by “affected” parties (i.e., those who invested significant resources, energy in the investigation and/or where the outcome affected their well-being and lives)?</p>

<p>This change is proposed to be consistent with the term “affected” used in Article 4.3.6(a).</p>	
<p>4.3.6 Accountability</p>	
<p>a. A procedure, which takes into account applicable privacy laws and regulations, to provide 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. <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. Information should be 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>This is an excellent revision as there has been inconsistency across institutions on what information is provided and to whom.</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>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>	<p>The revision makes sense but the justification below is not compelling. All matters pertaining to allegations are confidential. If the emphasis is on the allegation (rather the wrongly accused), institutions may need to disclose details of why an allegation has not been substantiated?</p> <p>Practically speaking, the respondent will want the attention here (i.e., be cleared). We have no problem with making the English text more consistent with the French text.</p>
<p>APPENDIX B: Glossary</p>	
<p>Responsible allegation An allegation: <u>1) that is based on facts which have not been the subject of a previous investigation; 2) and which that falls within Sections 2 and 3 of this RCR Framework; 3) which would have constituted a breach at the time the alleged breach occurred; and 4) for which the institution has direct access to the evidence necessary to corroborate or dismiss the allegation.</u></p>	<p>These changes help to clarify whether an institution should dismiss or pursue an allegation and assess whether allegations are responsible.</p>

<p>This proposed revision adds criteria for institutions to consider when deciding whether to dismiss or pursue an allegation. 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>New definition</p> <p><u>Responsible Conduct of Research (RCR)</u> <u>The behaviour 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>	<p>Additional values: accuracy, thoroughness</p>