

Comments from McGill University

Section 3.1.1 Breach of Tri-Agency Research Integrity Policy

a. New Breach: Lack of Rigour

This new proposed breach raised questions amongst several at McGill in terms of its subjectivity. It is contrasted to subsection b of 3.1.1. which is much more objective. As written this may open the door to allegations of research misconduct in relation to weak (poorly done) research due to lack of training in the specific discipline, lack of knowledge etc. It is, of course, expected that researchers are responsible to conduct rigorous research as per section 2.1.2. but to include this as research misconduct is very challenging. Peer review either at the level of grant applications or publications serves a purpose of detecting lack of rigour in research. In some cases differences of scientific opinion may overlap with concerns about lack of rigour.

Section 4.2 Promoting Responsible Conduct of Research

New Responsibility: Comment: Although seen as a positive step, this new responsibility will have resource implications for most universities.

Section 4.3.4 Investigating Allegations

- a. It is not clear why this has been added. In our view this does not add guidance. It is important that there is a single point of contact for receiving allegations and that the inquiry is led by one person.
- d. While we see the need to be consistent, there is no definition of “affected”. Individuals may make complaints who are not specifically affected but have brought the matter to the attention of the RIO. In such a case, subsection d could be interpreted to mean that there is no requirement to communicate with them.

Appendix B: Glossary

Responsible Allegation: The addition of point 4) suggests that if an allegation is made and it is determined as part of the inquiry that the institution cannot obtain direct access to the evidence necessary then the allegation is not responsible. This terminology does not have face validity and may be misinterpreted by complainants and misused by respondents. If there are options to revise this term, this is the time to do so. An alternative term might be “Admissible” . This is the term that is used in the English translation of the FRQ policy.