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June 23, 2021

The Panel on the Responsible Conduct of Research
c/o The Secretariat on Responsible Conduct of Research
160 Elgin Street, 9th Floor
Ottawa ON K1A 0W9
E-mail: secretariat@srcr-scr.ca

Dear colleagues;

Re: RCR Framework Consultation

Our comments, from a comprehensive research-intensive university in Alberta, are offered from the perspective of administrators who apply the policy in their work. These comments may be posted on the Panel's website after the comment period has closed.

We believe the proposed revisions will help clarify researcher and institutional responsibilities and simplify some of the inquiry and investigation processes. To that extent, we are supportive of these initiatives.

The new researcher and institutional responsibilities related to appropriate oversight, training and fair treatment in the conduct of research aligns well with graduate supervisory initiatives under discussion at the University of Alberta. These initiatives, proposed by the Faculty of Graduate Studies and Research, will help orient new faculty members to their responsibilities as supervisors and may be an opportunity for more established scholars to update their knowledge of Tri-Agency requirements. In parallel, the Faculty of Graduate Studies and Research is developing new mandatory online courses in Ethics and Academic Citizenship for graduate students, effective September 1, 2021. Taken together, and supported by the proposed revision, supervisors and graduate students will have a better shared understanding of their responsibilities, which should help prevent problems for faculty members and trainees alike.

Although the new breach - lack of rigour - may be open to a broad range of interpretations, we think it is an important addition to the framework, as is the definition of responsible conduct of research. The proposed changes related to investigation of allegations and accountability help clarify the processes that institutions should follow. Similarly, the definition of a *responsible allegation* will help streamline institutional decision-making.

A researcher here has noted that the existing RCR processes do not seem to recognize that grant review panels can play an important role in identifying non-compliant research. They and another panel member spotted issues of concern (plagiarism and data fraud) and reported them to CIHR. However, the researcher suggested that CIHR's processes for addressing these issues were unclear and there was no information that anything was done to address the issues. This situation does not seem to fit anywhere in the process

outlined in Appendix A, because the grant review panel discussions are confidential and panel members (“researchers”) are not allowed to contact the “Institution”.

It is also important to note that the timelines need to allow for cases involving dismissal or serious legal outcomes, which may take months, if not years, to conclude. Some flexibility needs to be provided in the Framework for these kinds of situations.

In summary, the proposed revisions seem to be a judicious combination of substantive changes designed to address omissions in the existing framework and editorial changes that will make this work a little easier.

Thank you for the opportunity to comment on these revisions.

Yours truly,

A handwritten signature in blue ink, appearing to read 'S Babcock', with a long horizontal flourish extending to the right.

Susan Babcock
Director

/seb

cc: M Strong, Office of the Provost and Vice-President (Academic)
J M Law, Office of the Provost and Vice-President (Academic)
K Moore, Office of the Vice-President (Research and Innovation)