Responsible Conduct of Research

The Tri-Agency Approach to Responsible Conduct of Research

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Overview of presentation

• Responsible Conduct of Research (RCR)
• Governance of RCR
• Tri-Agency Framework: Responsible Conduct of Research
• Role and responsibilities
• Breaches
• Process for addressing alleged breaches
• RCR statistics
• RCR education and outreach
Responsible Conduct of Research (RCR)

An umbrella term that refers to conducting research responsibly throughout the entire life cycle of a research project

- Application for funding
- Conduct and analysis of research
- Management of research funds
- Dissemination of research results
Why is RCR important?

• RCR is important because research is important
• Goal of research: advancement of knowledge
• To accomplish this goal, research must be accurate, reliable, credible – *trustworthy*
• Foundation for public trust (especially regarding publicly-funded research) - difficult to earn, easy to lose
Tri-Agency Governance of RCR

• Joint responsibility of the three federal research agencies (the Agencies):
  – Canadian Institutes of Health Research (CIHR)
  – Natural Sciences and Engineering Research Council (NSERC)
  – Social Sciences and Humanities Research Council (SSHRC)

• Agencies provide funding to institutions and researchers on condition that:
  – Institutions comply with Agency policies and enforce those policies
  – Researchers follow Agency policies

• Based on policy, enforced through funding

• Institutional policies apply to all research conducted under the auspices or jurisdiction of an institution – regardless of source of funding
Secretariat on Responsible Conduct of Research

**Mandate:** to promote high ethical standards in the responsible conduct of research

A. Responsible conduct of research (research integrity)
   - Panel on Responsible Conduct of Research

B. Ethics of human research
   - Panel on Research Ethics
RCR Framework: Objectives

• Ensure that funding decisions made by the Agencies are based on **accurate** and **reliable** information;

• Ensure public funds for research are used **responsibly** and in accordance with funding agreements;

• Promote and protect the **quality**, **accuracy** and **reliability** of research funded by the Agencies;

• Promote **fairness** in the conduct of research and the process for addressing allegations of policy breaches; and

• Promote **transparency** in instances of serious breaches.
RCR Framework: Scope

- Researchers who hold or apply for Agency funds must comply with the RCR Framework
- Each institution must develop and administer an RCR policy and address allegations of breach by its researchers
- Institutional RCR policies must comply with the minimum requirements of the RCR Framework
- RCR Framework applies to all research conducted under the auspices or jurisdiction of an eligible institution – regardless of source of funding
Key elements of the RCR Framework

- Sets out **timelines** for inquiry and investigation into allegations of breach
- Requires at least one **external member** on institutional investigation committees
- Requires **a designated RCR contact** at each institution
- Requires researcher consent to **public disclosure of serious breaches** as a condition of applying for funding
Responsibilities: Researchers

• Promote research integrity

• Provide true and accurate information to the Agencies

• Manage Agency funds responsibly

• Comply with Agency requirements for certain type of research

• Rectify breaches
Responsibilities: Institutions

- Develop and administer their own RCR policies that meet the minimum requirements of the RCR Framework
- Ensure researchers comply with the RCR Framework
- Investigate allegations in accordance with their RCR policies
- Report to Agencies when Agency funds are involved
Responsibilities: Agencies

- Ensure institutions respect the timelines for conducting inquiries and investigations
- Examine institutional inquiry/investigation reports
- In cases of breach, determine whether to take recourse
- Respond to RCR questions and interpret RCR Framework
RCR - Shared Responsibility

Researchers

Institutions

Agencies

Agreement on the Administration of Agency Grants and Awards by Research Institutions

Application & Funding Agreements

Institutional Policies
Tri-Agency Framework: Responsible Conduct of Research

- Joint framework of the three federal research agencies
- Describes responsibilities of researchers, institutions and Agencies
- Defines breaches of the RCR Framework
- Sets out the minimum requirements that must be included in institutional RCR policies regarding allegations
- Sets out the process that the Agencies follow for addressing allegations of breaches of Agency policies
Breach of the RCR Framework

Failure to comply with any Agency policy throughout the life cycle of a research project – from application for funding, to the conduct of the research and the dissemination of research results.

*Article 3.1, RCR Framework*
Intentionality

• The intention of an act is not relevant to the determination of a breach of the RCR Framework

• Any contravention of the RCR Framework is a breach (even honest error)

• Any breach, regardless of the reason, can negatively impact the integrity of the research and the integrity of the research record

• Intent is a consideration when deciding on the severity of the recourse that may be imposed
Scope of breaches

• Broader than fabrication, falsification and plagiarism (FFP)

• In addition to FFP, breaches may include:
  • Mismanagement of grant or award funds
  • Invalid authorship or inadequate acknowledgment
  • Destruction of research records
  • Self-plagiarism
  • Mismanagement of conflict of interest
  • Inaccurate or misleading information in funding applications
  • Conducting research involving human participants without ethics approval
Serious breach

• Definition
  – a breach that jeopardizes the safety of the public or brings the conduct of research into disrepute

• Assessment
  – nature of the breach
  – level of experience of the researcher
  – impact of the breach
  – other relevant factors

• Decision
  – made by Agency President, with the advice of PRCR

• Possible public disclosure
  – when applying for Agency funds, applicants consent to the disclosure of personal information in instances of serious breach
Examples of real-life breaches

• Copying text from an article published by someone else and including it in one’s own work without referencing the original article

• Changing raw data values to achieve expected outcomes

• Falsifying letters of support in a grant application

• Claiming the cost of purchases of personal items and personal travel against one’s research grant account

• Falsifying the identity of research participants and then fabricating the resulting “participant data”

• Embellishing one’s CV to improve chances of obtaining a research grant
Recourse

Types of recourse available to the Agencies in the event of a breach include, but are not limited to:

- Letter of awareness/education
- Letter of reprimand
- Training
- Correction of the research record
- Termination of a grant or award
- Requirement to reimburse funds
- Ineligibility to participate in peer review committees
- Ineligibility to hold/apply for Agency funding for a period of time or permanently
- Public disclosure (for serious breaches only)
Panel on Responsible Conduct of Research

- arm’s-length expert body (researchers, administrators)
- provides advice to the Agencies on matters related to the responsible conduct of research
- reviews institutional investigation reports
- advises Presidents on appropriate recourse in RCR matters
- reviews the RCR Framework every five years and provides advice to the Agencies on revisions to the Framework
Tri-Agency Process for Addressing Allegations

1. Allegation
2. Institutional Inquiry (2 months)
3. Institutional Investigation (if warranted) (5 months)
4. Report to Secretariat
   - Panel on RCR
   - Agency President
5. Communicate decision to relevant parties
6. Final Decision
7. Close file
8. Implement recourse
RCR Framework 2016: Highlights of revisions

• Clarification of definitions of researcher responsibilities and corresponding breaches;

• New responsibilities for researchers participating in Agency review processes;

• Information on annual reporting requirements for institutions;

• New institutional requirement that all anonymous allegations must be considered;

• Guidance on how to address allegations when more than one institution is involved.
Statistics (December 5, 2011 to March 31, 2017)

• 250 files addressed
  – 192 closed
  – 58 active

• Of the 192 closed files
  – 83 files involved at least one breach (43%)
  – 109 files did not involve a breach (57%)
Statistics (December 5, 2011 to March 31, 2017)

Categories of confirmed breaches:

- Plagiarism (23% or 26)
- Mismanagement of funds (15% or 16)
- Misrepresentation in an Agency application or related document (13% or 14)
- Lack of rigour (9% or 10)
- Falsification (8% or 9)
- Redundant publication / self-plagiarism (8% or 9)
- Breach of Agency policy or requirement for certain types of research (6% or 7)
- Mismanagement of conflict of interest (5% or 5)
- Invalid authorship (5% or 5)
- Fabrication (3% or 3)
- Other (5% or 5)
Statistics (December 5, 2011 to March 31, 2017)

Types de recourse imposed by the Agencies:

- Funding ineligibility (28% or 42)
- Peer review ineligibility (27% or 10)
- Letter of admonishment (17% or 26)
- Reimbursement of funds (11% or 16)
- Letter of awareness/education/ (8% or 12)
- Training (4% or 6)
- Termination of grant (3% or 5)
- Correction of the research record (1% or 1)
- Public disclosure (1% or 1)
RCR Education and outreach

- **Interpretations** to clarify RCR Framework, in response to questions or comments

- **Engagement** with the research community to better serve its needs
  - Introductory webinar on RCR Framework
  - RCR Forum - virtual community of practice
  - RCR file summaries of confirmed breaches (to be posted soon)
  - Presentations at conferences and institutions

- **Support** to attend world conferences on research integrity to enhance knowledge of RCR
Key take-away messages

• Promoting responsible conduct of research is a shared responsibility. Researchers, institutions, funders and others involved in the research process all have a role to play.

• RCR Framework is an important tool through which the Agencies promote responsible conduct of research.

• RCR education and engagement is critical to fostering and promoting a responsible conduct of research environment within every institution.
Questions?

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