

## **New Tri-Agency Framework on the Responsible Conduct of Research increases emphasis on Researcher Accountability for the Conduct of Research**

On December 5<sup>th</sup>, the Social Sciences and Humanities Research Council, the Canadian Institutes of Health Research and the Natural Sciences and Engineering Research Council (Tri-Council) officially launched a joint framework on [the responsible conduct of research \(RCR\)](#). This new umbrella policy is meant to increase both awareness and accountability of researchers in the conduct of their Research. Accompanied by a new requirement for researchers to provide consent for the disclosure of personal information in the event of a serious breach of agency policy, this framework provides for increased clarity in the accountability of researchers for the work they conduct that is important for the York research community to appreciate. Notably, the framework applies to all research conducted at institutions holding funding from tri-council, not just Tri-Council-funded research or researchers supported by Tri-Council.

The new policy replaces a collection of earlier research integrity documents including the *Tri-Agency Policy Statement on Integrity in Research and Scholarship (TCPS-I)*, the *Framework for Tri-Council Review of Institutional Policies Dealing with Integrity in Research*, and the *Tri-Agency Process for Addressing Allegations of Non-compliance with Tri-Agency Policies*.

Working to promote greater accountability in and transparency of the entire research process, the framework defines the responsibilities of researchers, institutions and agencies alike from application through the dissemination of results. The framework has four specific objectives: 1) to provide for appropriate funding decisions by Tri-Council; 2) to broadly ensure the responsible use of research funds by researchers and institutions; 3) to promote accurate, reliable, high quality research and; 4) to promote fairness and consistency both in the conduct of research and the investigation of allegations of policy breaches. With implementation of the RCR framework, both researchers and the institutions, with whom they are affiliated, are expected to be aware of and to uphold their responsibilities in the ethical conduct of research.

Like other Tri-Council documents such as the TCPS, the reach of the RCR framework is relatively broad as it applies to all research conducted by institutions that hold Tri-Council funding, not just Tri-Council-funded research. Thus, all researchers holding research funding will be required to adhere to the RCR framework in the conduct of their research irrespective of the funding source.

For researchers, the RCR framework provides detailed guidance on the responsibilities of researchers through all aspects of the research cycle. Thus the framework specifies the responsibilities of researchers with respect to research integrity, applying for funding, financial management and dissemination. It provides additional requirements for conducting certain types of research, such as research with human participants, animals, biological or radiological agents.

Minimally, researchers are responsible for the rigorous conduct of research, the maintenance of complete and accurate records (research, financial); thorough and accurate referencing; appropriate authorship and acknowledgement of all contributors and contributions to the research; and the proactive management of any real, potential or perceived conflict of interest. While none of these responsibilities are new, what is new is an increase in the implications and consequences to researchers for an even inadvertent failure to maintain this ethical contract.

Thus, all three federal granting councils will now require all applicants for their funding to sign a *Consent to Disclosure of Personal Information* that will allow them to publically name researchers and institutions that seriously breach the RCR guidelines

and agency policy. Breaches include contravention of research integrity policies (e.g. plagiarism, invalid authorship); misrepresentation in an agency application or related document (e.g. failure to disclose previous breaches); mismanagement of grants or award funds. It also includes omissions, deliberate or inadvertent, in obtaining appropriate approvals (such as research ethics) or deviations from approved research protocols. It is important for researchers to recognize that the distinction made previously between academic misconduct and procedural and policy breaches of agency requirements has been removed, with a concomitant increase in reporting requirements.

Moreover, with the new Framework the entire complaints process is expected to be made accessible to Tri-Council. When serious breaches are reported, the Tri-Council will, subject to applicable laws, release the researcher's name, the nature of the breach reported, the name of institution where the researcher was employed at the time of the breach, and the name of the institution where the researcher is currently employed. This substantially increases the transparency of reporting on research misconduct and the visibility of researchers, and thus we encourage that all York researchers be fully aware of all compliance expectations with respect to their research activities.

The good news is that researchers at York are already, by and large, a model of compliance for the ethical conduct of research. Thus, continued strong adherence to current practices together with an increase in individual vigilance will assure the continued success of your research programs. Additionally, staff in the Office of Research Services are always available to inform researchers about specific compliance requirements, review protocols and to educate researchers with respect to risks.

At the Institutional level, the RCR framework will result in some changes to York's current practice of responding to research ethics or protocol breaches. In the first instance, York will be reporting to the Secretariat on Responsible Conduct of Research (SRCR) regarding how our institutional policies for promoting the ethical conduct of research and addressing all types of policy breaches meets with Tri-Council requirements. Additionally, in keeping with the new requirements, we will henceforth be required to report to the Tri-Council, subject to any applicable laws and privacy legislation, serious allegations we receive related to activities funded by the agency that relate to significant financial, health and safety or other risks to the institution. Further, we are still required to report all findings of misconduct or fault in the conduct of research.

Thus, RCR and by extension the Tri-Councils will be now be aware of potential breaches as they are reported or identified. Should it be determined that a breach of policy has occurred, Tri-Council reserves the right to "*exercise the recourse it considers appropriate*". Such recourse could range from a letter of reprimand to seeking a refund for agency monies already expended. For those instances where a serious breach of an Agency policy has been determined, the Agency may choose to publish the name of the researcher and his or her institution subject to any relevant privacy laws.

The intent of this new framework is to enhance research integrity through the promotion of a positive and accountable research environment. We will be working closely with researchers to provide additional detail and insight on the new requirements, and would welcome any questions you may have.