

# Lakehead University

## Research Integrity Policy

### **Purpose:**

To promote the highest standards of quality, thoroughness and integrity in research and scholarly activity for all those involved in any capacity in research and scholarly activity at Lakehead University (hereinafter referred to as the “University”).

### **Preamble:**

Research, scholarly activity and innovation are central to the purpose and mission of the University and directly contribute to the advancement of health, culture, economic development and social development. The University, researchers, sponsors of research and our community partners recognize that research can best flourish in a climate of academic freedom. This climate relies on the integrity of university researchers and their compliance with the policies, practices and ethical standards governing research in Canada and abroad. The University is committed to maintaining the highest ethical standards in the conduct of research and to the ongoing education of its research community in matters of research integrity. Granting agencies in Canada and elsewhere require that such policies be established.

The individual researcher has the responsibility to abide by the Research Integrity Policy. The University has the responsibility to deal with breaches of the policy promptly should they occur within the institution, as well as to foster an environment that encourages the ethical conduct of research. Allegations of breaches of the Research Integrity Policy at the University will be effectively dealt with through formal procedures that ensure fairness and protection for both those whose integrity is brought into question and those who bring forward any allegations of a breach of the Research Integrity Policy.

### **Scope:**

This policy applies to all members of Lakehead University (herein after referred to as “University Members”) engaged in research and scholarly activity in any capacity. In the event of any inconsistency between this Policy and the LUFA Collective Agreement the terms of the Collective Agreement govern and shall prevail. Procedures for addressing allegations that a University Member who is also a LUFA member has breached this policy shall be handled using the process set out in Article 39 of the LUFA Collective Agreement. Allegations that any other University Member has breached this policy shall be handled utilizing procedures established by the Executive Team Working Group (ETWG) that are consistent with the Framework, this Policy and the principles of natural justice including procedural fairness.

The Northern Ontario School of Medicine (NOSM) will have in place a research integrity policy and procedures that are compliant with the *Tri-Agency Framework: Responsible Conduct of Research*.

Subject to applicable law and in particular the Ontario Human Rights Code, a breach of the Research Integrity Policy cannot be defended by excuses such as a lack of awareness of the policies, impairment by alcohol or drugs, etc.

This Policy has been developed to ensure compliance with the **Tri-Agency Framework: Responsible Conduct of Research**, as amended from time to time (hereinafter referred to as the “Framework”) and is available at <http://www.rcr.ethics.gc.ca/eng/policy-politique/framework-cadre/>). It applies equally to all research, funded or unfunded. Please note that the Policy does include specific reporting requirements to Tri-Agencies that only apply to funded research.

In the event of an inconsistency between this Policy, the Framework or any other provisions executed in connection herewith, the Framework shall prevail.

#### **Definitions:**

**“Agency”** means the funding agency, foundation, organization, sponsor or other entity, public or private, international, national, provincial or foreign, which supports the research in whole or in part, or which has oversight of any research activities, in respect of which the breach is alleged to have occurred.

**“Breach”** means a breach of the Framework (i.e., the 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, to the dissemination of research results. It includes all activities related to the research, including the management of Agency funds. In determining whether an individual has breached an Agency policy, it is not relevant to consider whether a breach was intentional or a result of honest error. However, intent may be a consideration in deciding on the severity of the recourse that may be imposed.<sup>1</sup>

**“Complainant(s)”** means an individual or representative from an organization who has notified the University or Agency of a potential breach of an Agency policy.<sup>1</sup>

**“Inquiry”** is the process of reviewing an allegation to determine whether the allegation is responsible, the particular policy or policies that may have been breached, and whether an investigation is warranted based on the information provided in the allegation.<sup>1</sup>

**“Investigation”** is a systematic process conducted by an Investigative Committee that involves the examination of an allegation, collection and examination of the evidence related to an allegation, and the making of a decision as to whether a breach of the Research Integrity Policy has occurred.<sup>1</sup>

**“Research”** is an undertaking intended to extend knowledge through a disciplined inquiry or systematic investigation. The conduct of research in the context of this policy includes applying for and managing Agency funds, performing research, and disseminating results.<sup>1</sup>

**“Researcher”** is anyone who conducts research activities.<sup>1</sup>

**“Research Data”** can include measurements, observations, survey results, recordings (audio or video), or any other primary products of research activity. These provide a factual basis for inference, conclusions, and publication. If data are defined in this way as research products necessary to validate

---

<sup>1</sup> Based on the Tri-Agency Framework: Responsible Conduct of Research <http://www.rcr.ethics.gc.ca/eng/policy-politique/framework-cadre/>

the integrity of published or reported work, then 'data' consist of more than just measurements written in a lab notebook.<sup>1</sup>

**“Respondent(s)”** means a University Member who is identified in an allegation as having possibly breached Agency or institutional policy.<sup>1</sup>

**“Responsible Allegation”** is an allegation made in good faith, confidentially and without malice, that is based on facts which have not been the subject of a previous allegation, and which falls within one or more breaches set out in Section 3 of the Framework.<sup>1</sup>

**“Responsible Senior Administrators”** refers to the President, Provost and Vice-President (Academic), the Vice-President Research and Innovation or their designees. Where the matter involves a LUFA member, there shall be no assignment of designees except as permitted by the terms of Article 39 of the LUFA Collective Agreement. In other cases the assignment of designees shall be consistent with collective agreements or other university policies and practices.

**“Serious Breach”** is a violation of the Research Integrity Policy that jeopardizes the safety of the public or brings the conduct of research into disrepute. This determination will be based on an assessment of the nature of the breach, the level of experience of the researcher, whether there is a pattern of breaches by the researcher, and other factors as appropriate. Examples of serious breaches may include: recruiting human participants into a study with significant risks or harms without Research Ethics Board approval, or not following approved protocols; using animals in a study with significant risks or harms without Animal Care Committee approval, or not following approved protocols; deliberate misuse of research grant funds for personal benefit not related to research; knowingly publishing research results based on fabricated data; obtaining grant/award funds from an Agency by misrepresenting one’s credentials, qualifications and/or research contributions in an application.<sup>1</sup>

**“Tri-Agency(ies)”** refers to Canada’s three federal granting agencies: the Canadian Institutes of Health Research (CIHR); the Natural Sciences and Engineering Research Council of Canada (NSERC); and the Social Sciences and Humanities Research Council of Canada (SSHRC).<sup>1</sup>

**“University”** means Lakehead University.

**“University Member”** includes but is not limited to any person paid by, under the control of, or contributing in any manner to a research project at the University and includes but is not limited to faculty members, adjunct professors, postdoctoral fellows, graduate students and undergraduate students taking part in research, directly or indirectly, and other research personnel, involved directly or indirectly in research, including, but not limited to, research associates, technical staff, librarians, visiting professors, volunteers, observers and institutional administrators and officials representing the University.

## Policy Statement:

Research and scholarly activity at the University will be conducted in a manner that is consistent with the highest standards of ethical and scientific practice. University Members are responsible for conducting their research and scholarly activity in accordance with the highest standards of research integrity as set out in the Framework, and, where applicable, the LUFA Collective Agreement. University Members shall strive to follow the best research practices honestly, accountably, and fairly in the search for, and in the dissemination of new knowledge. In addition, researchers shall follow the requirements of applicable institutional policies and professional or disciplinary standards and shall comply with applicable laws and regulations. Nothing in this Policy shall be construed to restrict the academic and artistic freedom of creative artists.

## Responsibilities:

**University Members** are responsible for the following, but are not limited to:

- **Rigour:** Scholarly and scientific rigour in proposing and performing research; in recording, analyzing, and interpreting data; and in reporting and publishing data and findings.
- **Record Keeping:** Keeping complete and accurate records of data, methodologies and findings, including graphs and images, in accordance with the applicable funding agreement, policies at the University and/or laws, regulations, and professional or disciplinary standards in a manner that will allow verification or replication of the work by others.
- **Accurate Referencing:** Referencing and, where applicable, obtaining permission for the use of all published and unpublished work, including theories, concepts, data, source material, methodologies, findings, graphs and images.
- **Authorship:** Including as authors, with their consent, all those and only those who have made a substantial contribution and who accept responsibility for, the contents of the publication or document. The substantial contribution may be conceptual or material.
- **Applying for and Holding Research Funding:** 1) Providing true, complete and accurate information in their funding applications and related documents and represent themselves, their research and their accomplishments in a manner consistent with the norms of the relevant field. 2) Certifying in grant applications that they are not currently ineligible to apply for, and/or hold funds from Agency funding sources or any other research funding organization world-wide for reasons of breach of responsible conduct of research policies such as ethics, integrity or financial management policies. 3) Ensuring that other researchers participating in the application have explicitly agreed to be included.
- **Acknowledgement:** Acknowledging appropriately all those and only those who have contributed to the research, including funders and sponsors.
- **Conflict of Interest Management:** Appropriately identifying and addressing any real, potential or perceived conflict of interest, in accordance with Lakehead University's Policy on *Conflict of Interest*, in order to ensure that the objectives of the Framework (Article 1.3) are met.
- **Legal and Regulatory Requirements:** Ascertaining and complying with all applicable legal and regulatory requirements with respect to their research and ensuring that research and scholarly work is conducted in accordance with *Article 2.4: Agency Requirements for Certain Types of Research* as outlined in the **Tri-Agency Framework: Responsible Conduct of Research**, in accordance with approved protocols and reporting requirements.

- **Privacy:** Protecting the privacy of any individuals whose personal information has been obtained as part of any research activity as required under the law and the *Tri-Council Policy Statement: Ethical Conduct of Research Involving Humans (TCPS2)*.
- **Record Retention Periods:** Retaining complete and accurate records of data, methodologies and findings, including graphs and images, in accordance with the applicable funding agreement, collective agreements, institutional policies and or laws, regulations and professional or disciplinary standards in a manner that will allow verification or replication of the work by others. **In the case of a LUFA member, the member shall retain records as required by Article 39 of the LUFA Collective Agreement and the Framework.**
- **Management of Research Funds:** Managing funds acquired for the support of research as required by the terms of research funding agreements, relevant university research policies, including the *Tri-Agency Financial Administration Guide* and Agency grants and awards guides; and providing true, complete and accurate information on documentation for expenditures from grant or award accounts.
- **Reporting Breaches of the Research Integrity Policy:** To report in good faith and confidentially any information pertaining to possible breaches of Agency policies in writing to the Vice-President Research and Innovation (with an exact copy to the Secretariat on Responsible Conduct of Research (the “SRCR”) if the allegation pertains to a Tri-Agency funded project) where the researcher involved is currently employed, enrolled as a student or has a formal association. Researchers in breach of an Agency policy are expected to be proactive in rectifying a breach, for example, by correcting the research record, providing a letter of apology to those impacted by the breach, or repaying funds.
- **Compliance when participating in Tri-Agency review processes:** Participants in Tri-Agency review processes must comply with the Conflict of Interest and Confidentiality Policy of the Tri-Agencies. Participants in Tri-Agency review processes confirm that they are not currently under investigation for an alleged breach of the Framework or any other responsible conduct of research policies such as ethics, integrity or financial management policies. If participants find themselves under investigation, they must temporarily withdraw themselves from participation in any Tri-Agency review process until the investigation is complete and a determination is made by the Tri-Agency whether they can resume their participation.

In addition to the above responsibilities, **Responsible Senior Administrators** are responsible for:

- a. Fulfilling their obligations under this Policy expeditiously and fairly with any known instance or allegation of a breach of the Research Integrity Policy;
- b. Protecting the confidentiality of information regarding a potential violation of this policy to the fullest extent possible;
- c. Encouraging activities that support research integrity among University Members;
- d. Supporting educational activities to facilitate and encourage a culture of research integrity at the University;
- e. Directing and overseeing processes and procedures for carrying out an Inquiry and Investigations and addressing allegations of a breach of this Policy by University Members from time to time, provided such processes are consistent with the Framework, this Policy, applicable collective agreements and the principles of natural justice including procedural fairness.

Any processes and procedures determined as set out above and in effect from time to time shall be posted on the University's website and included as a schedule to this Policy.

**The Vice-President Research and Innovation** has been designated by the University to be the first point of contact to receive allegations. If the allegation involves a “Serious Breach” to the Research Integrity Policy, the Vice-President Research and Innovation (at the request of an Agency or independently) has the authority to take immediate action to protect Agency funds or public health and safety by halting the research, pending the outcome of the inquiry/investigation. In cases involving a potential breach to research ethics policies, the Vice-President Research and Innovation will notify the responsible institutional ethics committee (for example, but not limited to, the Research Ethics Board(s), the Animal Care Committee, the Biosafety Committee) of anything that might potentially impact the ethics certification of a project. If an ethics committee, during the course of its continuing ethics review and monitoring activities discovers a potential breach of the Research Integrity Policy, non-compliance with regulatory requirements or approved protocols, it will report the breach to the Vice-President Research and Innovation so that he/she can commence a responsible conduct of research inquiry/investigation. Where the allegation is related to conduct that occurred at another institution (whether as an employee, a student or in some other capacity), the Vice-President Research and Innovation who received the allegation will contact the other institution and determine with that institution’s designated point of contact which institution is best placed to conduct the inquiry and investigation, if warranted. The institution that received the allegation must communicate to the complainant which institution will be the point of contact for the allegation.

Disciplinary or other action may be necessary in instances where research activities are in contravention of, or not in accordance with, this Policy. The rights and obligations established by collective agreements and university policy will be honoured.

**The University** will be responsible for fulfilling its obligations under this Policy in a timely, impartial and fair manner, maintaining appropriate confidentiality during the inquiry and investigation stages.

### **Breaches of the Research Integrity Policy**

Breaches of the Research Integrity Policy include, but are not limited to, the following<sup>1</sup>:

- A. Fabrication:** Making up data, source material, methodologies or findings, including graphs and images.
- B. Falsification:** Manipulating, changing, or omitting data, source material, methodologies or findings, including graphs and images, without acknowledgement and which results in inaccurate findings or conclusions.
- C. Destruction of research records:** The destruction of one's own or another's research 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.
- D. Plagiarism:** Presenting and using another's published or unpublished work, including theories, concepts, data, source material, methodologies or findings, including graphs and images, as one's own, without appropriate referencing and, if required, without permission.
- E. Redundant publication or self-plagiarism:** The re-publication of one’s own previously published work or part thereof, including data, in any language, without adequate acknowledgement of the source, or justification.

- F. **Invalid authorship:** Inaccurate attribution of authorship, including attribution of authorship to persons other than those who have made a substantial contribution to, and who accept responsibility for, the contents of a publication or document.
- G. **Inadequate acknowledgement:** Failure to appropriately recognize contributors.
- H. **Mismanagement of Conflict of Interest:** Failure to appropriately identify and address any real, potential or perceived conflict of interest, in accordance with the University's Policy on Conflict of Interest in research, preventing one or more of the objectives of the Framework from being met.
- I. **Misrepresenting Information:** Providing incomplete, inaccurate or false information in a grant or award application or related document, such as a letter of support or a progress report; applying for and/or holding a Tri-Agency award when deemed ineligible by the Tri-Agencies or any other research funding organization world-wide for reasons of breach of responsible conduct of research policies such as ethics, integrity or financial management policies; and listing of co-applicants, collaborators or partners without their agreement.
- J. **Mismanagement of Grants or Award Funds:** Using grant or award funds for purposes inconsistent with the policies of the Agencies; misappropriating grants and award funds; contravening Agency financial policies, namely the Tri-Agency Financial Administration Guide, Agency grants and awards guides; or providing incomplete, inaccurate or false information on documentation for expenditures from grant or award accounts.
- K. **Breaches of Agency Policies or Ethical Requirements for Certain Types of Research:** Failure to comply with research funding agreements, all applicable Agency policy requirements, or to comply with relevant policies, laws or regulations, for the conduct of certain types of research activities, including, but not limited to, the following:
  - a) Tri-Council Policy Statement: Ethical Conduct of Research Involving Humans (TCPS 2);
  - b) Canadian Council on Animal Care Policies and Guidelines;
  - c) Agency policies related to the Canadian Environment Assessment Act;
  - d) Licenses for research in the field;
  - e) Canadian Biosafety Standards and Guidelines;
  - f) Controlled Goods Program;
  - g) Canadian Nuclear Safety Commission Regulations;
  - h) Canada's Food and Drugs Act;
  - i) Research funding agreements, Tri-Agency Financial Administration Guide and Agency grants and awards guides; relevant Provincial, Federal and International statutes or regulations for the conduct of research; and
  - j) Failure to obtain appropriate approvals, permits or certifications before conducting research and scholarly activities.
- L. **Breach of Agency review processes:** Non-compliance with the Conflict of Interest and Confidentiality Policy of the Tri-Agencies when participating in Tri-Agency review processes or, participating in Tri-Agency review processes while under investigation for a breach of research integrity.

**Anonymous Allegations:**

As allowed by the Framework, anonymous allegations will be considered if accompanied by sufficient information to enable the assessment of the allegation and the credibility of the facts and evidence on which the allegation is based, without the need for further information from the complainant.

**Privacy and Confidentiality:**

The highest possible degree of confidentiality shall be maintained regarding all allegations, inquiries and investigations, subject to any public disclosure that might be required by the Agency or by law. All formal records concerning allegations and investigations shall be centrally and securely stored by the Office of the Provost and Vice-President (Academic).

If an allegation of a breach of the Research Integrity Policy is not supported, the University will remove and destroy all documentation concerning the allegation from the respondent's official personnel or student file. Record of the allegation will remain centrally and securely stored in the Provost and Vice-President Academic Office.

The University will take reasonable steps to protect complainants who make allegations in good faith or who it calls as witnesses. It is expected by the University that no member of the University's community will retaliate against a person making allegations in good faith. If retaliation is suspected, it should be reported to the Provost and Vice-President (Academic). The University will take action against those who make unfounded allegations that are reckless, malicious, vexatious, or in bad faith.

**Education:**

In accordance with the Framework, the University will offer research ethics, integrity workshops, and on-line tutorials offered by the Secretariat for the Responsible Conduct of Research (SRCR) for all University Members.

**Contact:**

For further information regarding this Policy, please contact the Vice-President Research and Innovation by e-mail: [vpresearch@lakeheadu.ca](mailto:vpresearch@lakeheadu.ca) or by telephone at 807-343-8201.

**Acknowledgements:**

The research integrity policies of McGill University, the University of Saskatchewan, McMaster University, the University of Toronto, the University of Alaska Fairbanks, and Queen's University were referenced in the development of this Policy.