

Policy Title: Integrity in Scholarship and Research

Parent Policy: None

Policy Administrator: Vice Provost of Research and Graduate Studies

Approval History: April 30, 2013; Senate Motion #2012/13-030
December 4, 2012; Senate Motion #2012/13-013
Est. October 1995; revised February 2007.
Revised: June 2015

Purpose:

The objectives of this policy are: In accordance with the **Tri-Agency Framework: Responsible Conduct of Research**, this policy promotes and protects the quality, accuracy, and reliability of research and scholarly activities conducted at the University and establishes a process for addressing allegations of research misconduct

Scope of this Policy: See the *Policy* section in the attached policy.

Policy Statement: See the attached policy.

Definitions: See the *Definition* and *Glossary* sections in the attached policy.

Child Policies: None

Monitoring Data: The Vice Provost of Research and Graduate Studies will provide Senate with a compliance report each fall semester for the preceding FA, SP, SU semesters on the objectives stated in the preamble section of the attached policy.

Trinity Western University

Integrity in Research and Scholarship Policy

The University recognizes that academic freedom is essential for progress in teaching, research and scholarship. The University also recognizes the necessity to maintain the highest ethical standards in the conduct of scholarly activities. Furthermore, the University has a responsibility to the public and to its funding sources to ensure that its members uphold integrity and honesty in all of their academic pursuits. In accordance with the **Tri-Agency Framework: Responsible Conduct of Research**, this policy promotes and protects the quality, accuracy, and reliability of research and scholarly activities conducted at the University and establishes a process for addressing allegations of research misconduct.

Date: October 1995

Revised: February 2007; December 2012; April 2013, June 2015

POLICY

All members of the University engaged in research and scholarly activities shall strive to follow the best practices, honestly, accountably, openly and fairly in the search for and in the dissemination of 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. The University holds all researchers responsible for conducting their research in strict observance of ethical standards and for:

1. Using a high level of rigour in proposing and performing research; in recording, analyzing, and interpreting data; and in reporting and publishing data and findings.
2. Keeping complete and accurate records of data, methodologies and findings, including graphs and images, in accordance with the applicable funding agreement, 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.
3. Referencing and, where applicable, obtaining permission for the use of all published and unpublished work, including data, source material, methodologies, findings, graphs and images.
4. Including as authors, with their consent, all those and only those who have materially or conceptually contributed to, and share responsibility for, the contents of the publication or document, in a manner consistent with their respective contributions, and authorship policies of relevant publications.
5. Acknowledging, in addition to authors, all contributors and contributions to research, including writers, funders and sponsors.
6. Providing true, complete and accurate information in funding applications and related documents and representing themselves, their research and their accomplishments in a manner consistent with the norms of the relevant field;
7. Appropriately managing any real, potential or perceived conflict of interest, in accordance with Trinity Western University's [Conflict of Interest in Research Policy](#), as well as revealing in writing to the University (through the Vice Provost of Research and Graduate Studies) any

material financial interest in a company that contracts with the University to undertake research, particularly research involving the company's products.

8. Seeking and obtaining approval by the University's Research Ethics Board before engaging in any research involving human subjects and then complying fully with the approved research protocols in the performance of the research.
9. Seeking and obtaining approval by the University's Animal Care Committee before engaging in any research involving animals and then complying fully with the approved research protocols in the performance of the research.
10. Seeking and obtaining approval by the University's Biosafety Committee before engaging in any research involving biohazards and then complying fully with the approved research protocols in the performance of the research, according to the Health Canada Laboratory Biosafety Guidelines.
11. Complying with External Grant regulations as they relate to the operational and financial terms of research grants and/or contracts awarded to the researcher.
12. Revealing in writing to sponsors, TWU (through the Vice Provost of Research and Graduate Studies), other universities, journals or funding agencies, any material conflict of interest, financial or other, that might influence their decision on whether the individual should be asked to review manuscripts or applications, to test products or to be permitted to undertake work sponsored from outside sources.
13. Complying with [Intellectual Property Policy](#) and licensing agreements of the University and the relevant funding agency as they pertain to the commercialization of research.

Misconduct in research or scholarship may be committed with varying degrees of intent. It is recognized that the line separating carelessness and negligence from intentional dishonesty may be very narrow. Any lapse of scholarly integrity is objectionable and, depending on its severity, is subject to a range of disciplinary measures up to and including dismissal or expulsion. Allegations of misconduct shall be dealt with in an impartial, equitable, fair and timely manner, with due regard to the privacy and confidentiality rights of all parties involved. All parties shall be advised of the procedures available to them and persons against whom allegations of misconduct have been made shall be advised of the allegations against them, and shall be accorded the opportunity to provide a response.

DEFINITIONS

Misconduct in research refers to, but is not limited to, any breach of the present policy and includes:

- *Fabrication*: Making up data, source material, methodologies or findings, including graphs and images.
- *Falsification*: Manipulating, changing, or omitting data, source material, methodologies or findings, including graphs and images, without acknowledgement, resulting in inaccurate findings or conclusions.
- *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.
- *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 reference to the original source and, if required, without permission.

- *Redundant publications*: The re-publication of one's own previously published work or part thereof, or data, in the same or another language, without adequate acknowledgment of the source, or justification for republication.
- *Invalid authorship*: Inaccurate attribution of authorship, including attribution of authorship to persons other than those who have contributed substantially to the intellectual content, or agreeing to be listed as author to a publication for which one made little or no material contribution.
- *Inadequate acknowledgement*: Failure to appropriately recognize contributions of others in a manner consistent with their respective contributions and with authorship policies of relevant publications.
- *Mismanagement of Conflict of Interest*: Failure to appropriately manage any real, potential or perceived conflict of interest, in accordance with the university's policy on conflict of interest.
- *Mismanagement of Research Funds*: Misappropriating grants and awards funds or providing inaccurate or false information on documentation for expenditures from research funds.

The *complainant* is the person making an allegation of misconduct in research; the complainant may or may not be directly affected by the alleged misconduct and may be a university administrator.

The *respondent* is the person accused by the complainant of misconduct in research.

PROCEDURES/GUIDELINES

Responsibility for Responding to Alleged Misconduct

The Vice Provost Research and Graduate Studies is responsible for receiving and responding to all allegations of misconduct in research. The Vice Provost Research and Graduate Studies may designate another senior academic administrator to whom responsibilities under this policy are delegated. When the Vice Provost Research and Graduate Studies is a party to the alleged misconduct, then the Provost will assume the role of the Vice Provost Research and Graduate Studies under this policy.

Allegations of Misconduct

All allegations of misconduct in research and information relating to allegations of breaches of the present policy must be made responsibly to and received confidentially by the Vice Provost Research and Graduate Studies. A formal allegation of misconduct in research may be made by any member of the university community, or by any other person. For example, the allegation may be made by a member of faculty or staff, a University administrator, a granting source, a student, a member of the general public, a media report or an anonymous source. An allegation should normally be presented in writing and include all relevant evidence, appropriately documented, and be signed and dated. If an allegation is incomplete or otherwise improperly documented, the Vice Provost Research and Graduate Studies may contact the complainant and request additional information.

Anonymous allegations will not normally be considered. However, if compelling evidence of misconduct is received anonymously by the Vice Provost Research and Graduate Studies, he or she may initiate the investigation process described below, on the basis of this evidence.

Protection of Complainant

Measures will be taken, at all stages of the process established by this policy and to the full extent possible, in accordance with the law, to protect from any reprisals individuals making an allegation in good faith or providing information related to an allegation.

Privacy

The matters pertaining to the allegations and investigation will remain confidential to those parties directly involved or investigating the circumstances. The privacy of the complainant(s) and respondent(s)

will be protected as far as is possible. Any and all information and records relating to an action under this policy will be handled by the University in compliance with its own [Privacy Policy](#) and the Protection of Privacy Act.

Time Lines

Although timelines are defined below, circumstances may dictate exceptions which will be granted by the Vice Provost Research and Graduate Studies after consultation with the concerned parties. Allegations of misconduct in research should be made as soon as possible after an apparent misconduct has been identified.

Informal Proceedings

Instances of alleged misconduct in research may be resolvable through informal proceedings. Informal proceedings shall take place only if both the complainant and the respondent agree, and cannot be required as a first step in dealing with an allegation of misconduct. Such informal proceedings will include appropriate provision for ensuring impartial, equitable, and fair processes. If the matter is not resolved by informal proceedings, or the complainant or respondent prefers not to engage in such proceedings, the allegation will be addressed through formal procedures.

Immediate Action

Upon receiving a formal allegation of misconduct in research, as justified by the nature of the allegation and the evidence submitted with it, the Vice Provost Research and Graduate Studies, or his or her designate,¹ may decide to take immediate action to suspend some research activities or protect the administration of research funds, including the freezing of grant accounts and any other reasonable measures, as appropriate.

Procedure

1. Upon receipt of an allegation of misconduct in research, the Vice Provost Research and Graduate Studies will promptly request in writing an informal meeting with the respondent(s) in order to determine whether a formal investigation is warranted. Notice of this meeting shall inform the respondent that an allegation of misconduct has been received and that the purpose of the meeting is to help determine whether a formal investigation is warranted. The notice should include a brief summary of the allegation and inform respondents of their right to be accompanied by a person of their choice in this and any future meetings, hearings or other sessions related to a formal investigation.
2. During the informal meeting with the respondent and his/her representative, any and all statements made will be without prejudice and no formal record will be kept of its proceedings. Throughout the process, the respondent will be allowed due process and full opportunity to respond to the allegations.
3. After this informal meeting, the Vice Provost Research and Graduate Studies may
 - a. dismiss the allegation.
 - b. resolve the allegation through informal proceedings.
 - c. inform the person(s) named in the allegation in writing of the allegation and appoint an Investigative Committee, if in the judgment of the Vice Provost Research and Graduate Studies the allegation has sufficient substance to warrant an investigation.
4. The Vice Provost Research and Graduate Studies may accept an admission of misconduct by the respondent(s), provided that it is made in writing and reflects the fact of the case as disclosed by the complainant and understood by the Vice Provost Research and Graduate Studies. In such cases, the Vice Provost Research and Graduate Studies may immediately proceed to take appropriate action to respond to the allegation that was admitted to by the respondent.

¹ In the procedure section of this document, any use of the term "Vice Provost of Research and Graduate Studies" includes his or her designate.

5. When the Vice Provost Research and Graduate Studies finds that a formal investigation is warranted, the notice to the respondent(s) shall enclose a full copy of the signed allegation and an invitation to respond to it in writing. If an affected person believes that the decision of the Vice Provost Research and Graduate Studies was reached improperly or disagrees with that decision, an appeal or grievance as appropriate may be filed, according to the terms of the appeal or grievance mechanism applicable to that person. If no such mechanism is in place, an appeal may be filed with the President. The President's, or his or her designate's, decision is final.
6. If a formal investigation is warranted, the Vice Provost Research and Graduate Studies will inform the respondent(s) and the complainant(s) in writing, normally within ten working days of receipt of the allegation.
7. The Vice Provost Research and Graduate Studies will appoint an Investigation Committee with the authority to decide whether a breach occurred. The Investigation Committee will consist of up to three faculty members appointed from a roster of faculty with suitable expertise and experience in conducting research and who are without conflict of interest, whether real or apparent, and at least one external member who has no current affiliation with the University. The Committee will provide the respondent specific meeting times to discuss the allegations and evidence prior to conclusions being made.
8. The procedures to be followed by the Investigation Committee must be guided by the principle of fairness, applicable to all parties. The respondent(s) and complainant(s) will have adequate opportunity to know any evidence presented by any party and to respond to that evidence if they so choose. The purpose of the investigation shall be fact-finding and formulation of a conclusion as to whether misconduct in research occurred and the responsibility, if any, of the respondent(s). The appropriate criterion for a decision is the presence of clear and convincing evidence. The Investigation Committee should communicate in its decision and recommendations in writing to the Vice Provost Research and Graduate Studies within thirty working days. An extension of this time period may be granted by the Vice Provost Research and Graduate Studies if justified by the circumstances and the complexity of the investigation. The report of the Investigation Committee shall include a copy of the allegation signed by the complainant(s), the written response of the respondent(s), if any, the findings and decisions of the panel and its recommendation for any action to be taken.
9. The Investigation Committee will provide its report, including its final decision and recommendations, to the Vice Provost Research and Graduate Studies within fifteen days after completing its draft report.
10. The Investigation Committee will make recommendations to the Vice Provost for Research and Graduate Studies. These recommendations may include:
 - a. disciplinary actions, such as a letter of reprimand, probation, suspension, termination of employment, or expulsion of a student.
 - b. if applicable, notification of editors in which the involved research was reported.
11. After receiving the report of the Investigation Committee, the Vice Provost Research and Graduate Studies shall reach a decision within thirty days and determine what actions, if any, are to be taken, which may include, but are not limited to, those listed below:
 - dismissal of the allegation
 - a formal warning
 - sanctions against a respondent found to have engaged in misconduct
 - actions to protect or restore the reputation of the respondent, if wrongfully accused
 - actions to protect a complainant found to have made a responsible accusation
 - sanctions against a complainant found to have made an irresponsible or malicious allegation
12. The Vice Provost Research and Graduate Studies will communicate his or her decision in writing, confidentially, to the complainant(s) and respondent(s).
13. At the conclusion of the proceedings, the Vice Provost Research and Graduate Studies will produce a final report. A copy of the final report will be sent confidentially to the complainant(s) and the respondent(s), containing: a summary of the specific allegation(s); the findings and

reasons for the findings and recommendations of the Investigation Committee; the researcher's response to the allegation(s), investigation and findings and any measures the researcher has taken to rectify the breach of policy; the decision of the Vice Provost Research and Graduate Studies; the outcome of an appeal, if one was made; and the final outcome, including sanctions imposed and/or actions taken by the University. The final report will be submitted to the President and Provost.

14. In cases of collaborative research involving other institutions, the Vice Provost Research and Graduate Studies may modify these procedures to facilitate the conduct of parallel or joint investigations or as otherwise deemed appropriate by the Vice Provost Research and Graduate Studies.

Sanctions and Other Measures

All sanctions and measures taken as a result of the procedures described above must be proportional to the severity of the misconduct. In the case of faculty, disciplinary action will comply with the relevant provisions in the Faculty Employment Policies. In the case of students, the Vice Provost Research and Graduate Studies will consult with the Associate Provost for Student Life to determine how policy applicable to student conduct will be applied. If sanctions or actions are components of the decision contained in the final report, the sanctions or actions will be imposed or taken by the Vice Provost Research and Graduate Studies unless another person is designated to do so by existing university policies, employment policies, or by legislation. In such cases, the final report will be transmitted to that other person, as a recommendation for action.

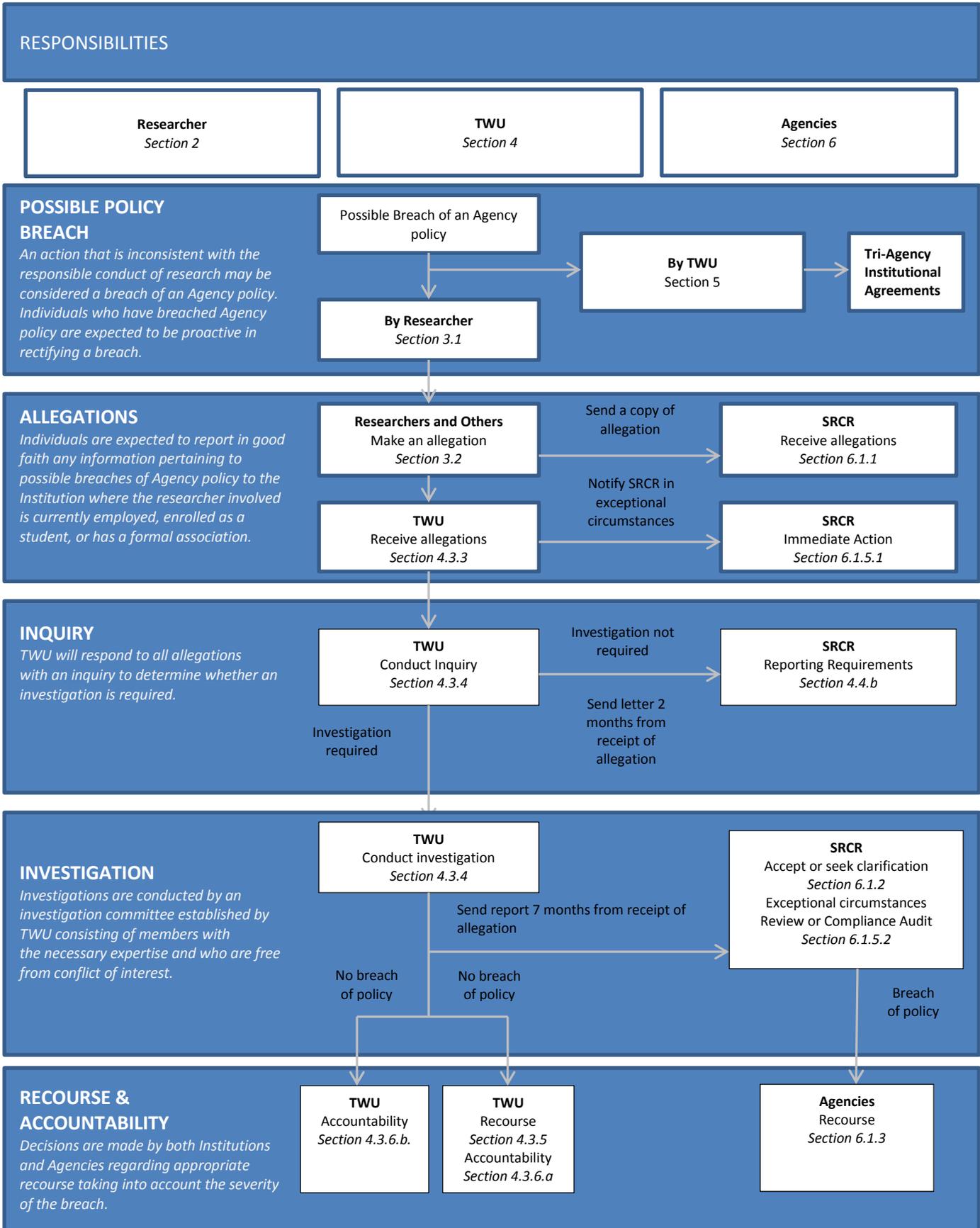
Appeals

If a person affected by the misconduct or by the decision of the Vice Provost Research and Graduate Studies believes that that decision was reached improperly or disagrees with that decision, an appeal or grievance as appropriate may be filed, according to the terms of the appeal or grievance mechanism applicable to that person. If no such mechanism is in place, an appeal may be filed, within fifteen working days of the receipt of the report, with the President or, if appropriate, with the national granting agency which funded the research with respect to which an allegation of misconduct was made.

Notifications

In cases where the research misconduct involved activities funded in whole or in part by one of the national granting councils *and* where that misconduct may involve significant financial, health and safety, or other risks, the Vice Provost Research and Graduate Studies will immediately advise the relevant Agency or Secretariat of Responsible Conduct of Research (SRCR) of the allegations. In cases where the research misconduct involved activities funded in whole or in part by one of the national granting councils or another funding agency, a copy of the final report prepared by the Vice Provost Research and Graduate Studies will be transmitted to that council or SRCR, or other funding agency by the Vice Provost Research and Graduate Studies. If an allegation is dismissed or it is otherwise determined to have been unfounded, and a granting council or other funding agency is known to be or is likely to be aware of the allegation, the Vice Provost Research and Graduate Studies will so inform the council or other funding agency and the University will make every effort to protect or restore the reputation of those wrongly subjected to an allegation. When the Vice Provost Research and Graduate Studies determines it to be in the best interests of the University, a report on the investigation of misconduct and its outcome will be disseminated to persons with a legitimate interest in knowing about them, such as the research subjects themselves or co-investigators. This report will normally contain no information that would identify the parties, unless this action is fully consistent with the final outcome of this case as described in the final report.

A SUMMARY OF PROCESS



B GLOSSARY

This glossary is intended to assist readers in their understanding of the *Tri-Agency Framework: Responsible Conduct of Research*, also referred to as “the Framework.” Terms are defined in accordance with the purposes and objectives of the Framework.

Accountability: Being responsible for one’s actions.*

Agencies: Canada’s three federal granting agencies: the Canadian Institutes of Health Research (CIHR); the Natural Sciences and Engineering Research Council (NSERC); and the Social Sciences and Humanities Research Council (SSHRC).

Agency policies: The set of rules, directives and guidelines published by an individual Agency or jointly by the Agencies.

Allegation: A declaration, statement, or assertion communicated in writing to an Institution or Agency to the effect that there has been, or continues to be, a breach of one or more Agency policies, the validity of which has not been established.

Applicant (including co-applicant): An individual who has submitted an application, individually or as part of a group or team, for funding from the Agencies.

Author (including co-author): The writer, or contributing writer, of a research publication or document.

Complainant: An individual or representative from an organization who has notified an Institution or Agency of a potential breach of an Agency policy.

Conflict of interest: A conflict of interest may arise when activities or situations place an individual in a real, potential or perceived conflict between the duties or responsibilities related to research, and personal, institutional or other interests. These interests include, but are not limited to, business, commercial or financial interests pertaining to the individual, their family members, friends, or their former, current or prospective professional associates.[†]

Eligible institution: An Institution that (a) meets the eligibility requirements to receive funding set out in guidelines issued by the Agency; and (b) has signed the *Memorandum of Understanding on the Roles and Responsibilities in the Management of Federal Grants and Awards*.

Fairness: Being impartial and using sound judgment free of prejudice or favouritism.*

Funding agreement: A written agreement that sets out the terms and conditions that an Agency and a researcher agree to for a particular grant or award. It defines the researcher’s responsibilities, what constitutes a breach of the agreement, and the consequences of a breach.

Honesty: Being straightforward, and free of fraud and deception.*

Inquiry: 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.

Investigation: A systematic process, conducted by an Institution's investigation committee, of examining an allegation, collecting and examining the evidence related to the allegation, and making a decision as to whether a breach of a policy(ies) has occurred.

Institution: The universities, hospitals, colleges, research institutes, centres and other organizations eligible to receive and manage Agency grant funds on behalf of the grant holders and the Agencies.

Institutional policy: The set of rules, directives and guidelines published by an individual Institution that meet the requirements of *Tri-Agency Framework: Responsible Conduct of Research*.

Memorandum of Understanding (MOU): The agreement between the Agencies and Institutions eligible to receive and manage research funding from the Agencies.

Non-eligible institution: An Institution other than an eligible institution.

Openness: Being transparent in process and practice, as characterized by visibility or accessibility of information.*

Research: An undertaking intended to extend knowledge through a disciplined inquiry or systematic investigation.

Researcher: Anyone who conducts research activities.

Respondent: An individual who is identified in an allegation as having possibly breached Agency and/or institutional policy.

Responsible allegation: A substantially novel 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 this Policy.

Serious breach: In determining whether a breach is serious, the Agency will consider the extent to which the breach 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 the Agencies by misrepresenting one's credentials, qualifications and/or research contributions in an application.

* CCA (2010). *Honesty, Accountability and Trust: Fostering Research Integrity in Canada*. Ottawa: Council of Canadian Academies.

† Based on definition *TCPS 2: Tri-Council Policy Statement: Ethical Conduct of Research Involving Humans*. Based on definition *TCPS 2: Tri-Council Policy Statement: Ethical Conduct of Research Involving Humans*.