



MEMORANDUM

To: Gillian Balfour, Chair APPC

From: Noah Arney, Policy Specialist
Office of the Provost & VP Academic, Office of the General Counsel

Date: January 23, 2025

Subject: Research Integrity policy, replacing Integrity in Research and Scholarship policy

Purpose of this document:

Approving the revised Integrity in Research and Scholarship policy ED 15-2, now renamed Research Integrity.

Background:

TRU's Integrity in Research and Scholarship policy is out of date and no longer in full alignment with the Tri-Agency Framework: Responsible Conduct of Research (RCR). This new policy will replace the current policy with a new Research Integrity policy (the Policy) that aligns with RCR. Due to the substantial changes this policy is a replacement of the earlier policy and so is not provided in redline.

The current policy was approved in 2012 and is no longer up to date with the current version of RCR or with how TRU manages research integrity. The new policy makes substantial changes to ensure our alignment with RCR. In many cases the wording is directly taken from RCR. TRU is required to have an updated version of this policy to align with our responsibilities regarding Tri-Agency funding.

Summary of Proposed Amendments:

- Clearly outlining all responsibilities for ethical conduct of research and scholarly integrity
- Placing the role for administration and misconduct allegations with the Provost and education jointly between the Provost and VP Research
- Updating the definitions of scholarly misconduct to align with RCR
- Updating the misconduct allegation section to align with procedural fairness and RCR
- Removing informal resolutions from the policy
- Updated the reporting and confidentiality requirements to align with RCR
- Moving the establishment of the Research Ethics Board to a separate policy



Summary of Engagement:

- Identified as a priority by Office of VP Research
- Written with Director of Research Initiatives and Policy Specialist
- Reviewed by VP Research and Provost
- Reviewed by Legal
- Reviewed by People and Culture
- Reviewed by Policy Subcommittee of APPC
- Reviewed by Research Committee of Senate
- Shared broadly with TRU Community

Recommended Steps:

1. Review by APPC February 2025
2. Notice of Motion at Senate February 2025
3. Approval of the policy proposal by Senate March 2025

Proposed Motion:

APPC: RESOLVED that APPC approves the proposed Research Integrity policy ED 15-2 and recommends Senate approve it.

Senate: RESOLVED that, on the recommendation of APPC, Senate approves the proposed Research Integrity policy ED 15-2.

Attachments:

- Research Integrity Policy

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| POLICY NUMBER | ED 15-2 |
| APPROVAL DATE | (Leave blank; will be completed once approved) |
| AUTHORITY | Senate |
| CATEGORY | Educational; Research; Conduct |
| PRIMARY CONTACT | Provost & Vice-President Academic |
| ADMINISTRATIVE CONTACT | Vice-President Research |

POLICY

Thompson Rivers University (TRU) supports and encourages the highest standards of conduct in research and scholarship. Toward that end, TRU strives to provide a positive environment that supports research excellence and that fosters researchers' abilities to act honestly, accountably, openly, and fairly as well as respecting Indigenous principles of relationality, respect, responsibility, and reciprocity in the search for, and dissemination of, knowledge. TRU will actively support education and training in integrity in scholarship as well as knowledge-seeking, knowledge creation, and creative inquiry.

This policy aligns with the Tri-Agency Framework: Responsible Conduct of Research (RCR) (2021) and will be updated to remain consistent with it. To better align with RCR some language in this policy has been adopted directly from it. Should there be any discrepancies between this policy and the RCR, the most recent version of the RCR takes precedence.

Primary responsibility for high standards of conduct in research and scholarship rests with the individuals carrying out these activities.

The Provost & Vice-President Academic is the responsible officer for this policy including being the contact for receiving protected disclosures, allegations of breaches of policies, and information related to allegations.

REGULATIONS

All faculty members, staff, other employees, students, postdoctoral researchers and all others involved in research associated with TRU are required to adhere to the principles described in these regulations. Misconduct in research and scholarship is an offence which, depending on its severity, is subject to a range of sanctions and progressive disciplinary measures up to and including dismissal or indefinite suspension.

Breach of the policies, rules, or guidelines of TRU or a funding agency or organization, or relevant laws or contractual obligations, in relation to research and scholarship is considered a breach of this policy.

1 RESPONSIBILITIES

It is the responsibility of the entire University Community to support a culture of scholarly integrity. No member of the University Community will breach this policy, engage in scholarly misconduct, make a malicious allegation of misconduct, or engage in retaliation against anyone following this policy.

1.1 THE UNIVERSITY

TRU is responsible for:

1. The development and implementation of this policy in alignment with the RCR.
2. Promoting and providing education on scholarly integrity including providing guidance to researchers on relevant policies and applicable laws, rules, and guidelines.
3. Reporting allegations to the appropriate agency, organization, or to the Secretariat on Responsible Conduct of Research.
4. Investigating allegations of scholarly misconduct.

1.2 RESEARCHERS

All those conducting research and scholarship, or otherwise involved in the research enterprise in any capacity whatsoever at TRU shall adhere to ethical standards. Researchers are responsible for promoting research integrity which includes the following as defined in the RCR:

- **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, institutional policies, 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 to, and who accept responsibility for, the contents of the publication or document. The substantial contribution may be conceptual or material.
- **Acknowledgement:** Acknowledging appropriately all those and only those who have contributed to research, including funders and sponsors.
- **Conflict of interest management:** Appropriately identifying and addressing any real, potential or perceived conflict of interest, in accordance with the Institution's policy on conflict of interest in research, in order to ensure that the objectives of the RCR Framework (Article 1.3) are met.

Researchers are also responsible for:

1. **Disclosure:** Providing accurate information and documentation for expenditures from grant, contract, and award accounts.
2. **Approvals:** Seeking and obtaining any necessary approvals, permits, or certifications before conducting certain types of research, from the appropriate committee which may



include the Research Ethics Board, Animal Care Committee, and the Biohazards Committee.

3. **Protocols:** Respecting local cultural protocols, and obtaining all necessary approvals, for engaging in any research or scholarship when partnering with Tk'emlúps te Secwépemc or T'éxelc or any other Indigenous nation or community as defined in TCPS2. Additional guidance for this may be given in TCPS2.
4. **Compliance:** Following all applicable laws, rules, policies, and TRU requirements for the conduct of research, including but not limited to the:
 - a. Tri-Agency Framework: Responsible Conduct of Research (RCR, 2021);
 - b. Tri-Council Policy Statement: Ethical Conduct for Research Involving Humans (TCPS2, 2022);
 - c. Canadian Council on Animal Care Policies and Guidelines;
 - d. Agency policies related to the Impact Assessment Act;
 - e. Licenses for research in the field;
 - f. Laboratory Biosafety Guidelines;
 - g. Controlled Goods Program;
 - h. Canadian Nuclear Safety Commission (CNSC) Regulations;
 - i. Canada's Food and Drugs Act;
 - j. Conflict of Interest and Confidentiality Policy of the Federal Research Funding Organizations; and
5. **Supervision:** Researchers with oversight roles provide appropriate supervision and training in the conduct of research to those they oversee.

1.3 PROVOST & VICE PRESIDENT ACADEMIC

The Provost & Vice-President Academic (Provost) is responsible for administering this policy and all record keeping and reporting under this policy as well as under the RCR as required. If the Provost was a party to the alleged misconduct, the Vice-President Research will assume the Provost's role in applying this policy.

The Provost will make available to the University Community any procedures for the conduct and administration of this policy.

2 EDUCATION AND AWARENESS

The Provost, in consultation with the Office of the Vice-President Research will develop and provide training and education on scholarly integrity and research ethics. The Office of the Provost and the Office of the Vice-President Research will promote awareness of these topics and provide access to related resources to all members of the University community. They will support researchers by ensuring they are aware of the requirements laid out in this policy and by communicating with the University Community on matters relating to Scholarly Integrity and how to make an allegation of scholarly misconduct.

The Office of the Provost will develop and share an annual report on findings of breaches of this policy.

3 SCHOLARLY MISCONDUCT

Scholarly misconduct means conduct that breaches the scholarly standards or a failure to meet the expectations outlined in section 1.2 of this policy. This breach may be intentional or a result of honest error and also includes, but is not limited to, any of the following as defined by the RCR:

1. **Fabrication:** Making up data, source material, methodologies or findings, including graphs and images.
2. **Falsification:** Manipulating, changing, or omitting data, source material, methodologies or findings, including graphs and images, without appropriate acknowledgement, such that the research record is not accurately represented.
3. **Destruction of research data or records:** The destruction of one's own or another's research data or records or in contravention of the applicable funding agreement, institutional policy and/or laws, regulations and professional or disciplinary standards. This also includes the destruction of data or records to avoid the detection of wrongdoing.
4. **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.
5. **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 acknowledgment of the source, or justification.
6. **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.
7. **Inadequate acknowledgement:** Failure to appropriately recognize contributors.
8. **Mismanagement of Conflict of Interest:** Failure to appropriately identify and address any real, potential or perceived conflict of interest, in accordance with the Institution's policy on conflict of interest in research, preventing one or more of the objectives of the RCR Framework (Article 1.3) from being met.
9. **Misrepresentation in an Agency Application or Related Document**
 - a. 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.
 - b. Applying for and/or holding an Agency award when deemed ineligible by CIHR, NSERC, SSHRC, or any other research funding organization worldwide for reasons of breach of responsible conduct of research policies such as ethics, integrity or financial management policies.
 - c. Listing of co-applicants, collaborators or partners without their agreement.
10. **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 Guide on Financial Administration, Agency grants and awards guides; or providing incomplete, inaccurate or false information on documentation for expenditures from grant or award accounts.
11. **Breaches of Agency Policies:** failing to meet Agency policy requirements or, to comply with relevant policies, laws or regulations, for the conduct of certain types of research



activities; failing to obtain appropriate approvals, permits or certifications before conducting these activities.

12. **Breaches of Agency Review Processes:** Non-compliance with the Conflict of Interest and Confidentiality Policy of the Federal Research Funding Organizations or participating in an Agency review process while under investigation.

4 ALLEGATIONS OF SCHOLARLY MISCONDUCT

All allegations of misconduct, inquiries, and investigations under this Policy will protect the privacy of the Complainant(s) and Respondent(s) to the extent possible provided under applicable university policy, collective agreements, and/or legislation. All allegations will be dealt with following the principles of procedural fairness and in accordance with any relevant collective agreements.

4.1 MAKING AN ALLEGATION

Allegations of misconduct in research and scholarship may be made by any person inside or outside of TRU. Protected disclosures, allegations of breaches of policies and information related to allegations, should be directed in writing to the Provost. All allegations under this policy must be based in facts and made in good faith.

An anonymous allegation which includes enough information to assess its validity and begin an investigation is allowed under this policy. Those making anonymous allegations are not considered a Complainant.

4.2 RESPONDING TO AN ALLEGATION

1. When an allegation is made under this policy the Provost will immediately begin an initial inquiry to determine whether:
 - a. the allegation is based in fact;
 - b. a formal investigation is warranted;
 - c. it falls under the scope of this policy; and
 - d. the allegation, if proven, constitutes Scholarly Misconduct.
2. This initial inquiry will normally be delegated to an appropriate Vice-Provost, Associate Vice-President, Dean, or Director who reports to the Provost or the Vice-President Research. In all cases the person conducting the initial inquiry will be someone who has the necessary academic expertise to assess the allegations and who has no perceived or real conflicts of interest.
3. During the initial inquiry additional Respondents, Complainants, and witnesses may be identified.
4. The Respondent will be made aware of the substance of the allegations and allowed to respond.
5. The Respondent and Complainant have the right to a support person of their choosing to assist them who may have access to all information available to them, provided that it must be kept confidential. Members of unions and employee associations have the right to representation that their collective agreement confers.
6. At the discretion of the Provost immediate action may be taken to protect the administration of funds associated with the research in question up to and including freezing the accounts or requiring the signature of the Provost or Vice-President

Research on all expenses. This will not be seen as a finding of fact in the process but is a temporary protective measure while the inquiry and investigation are undertaken.

7. The decision of the initial inquiry must be reported to the Provost within 30 working days of the delegation.
8. The decision of the initial inquiry will be reported to the Respondent within 10 working days of the Provost receiving it.
9. If the initial inquiry determines that the allegation is based in fact and that the alleged conduct could constitute scholarly misconduct a formal investigation will begin.
10. In the case of an allegation of misconduct that occurred at another organization, agency, or institution the Provost will coordinate with the other organization, agency, or institution's designated point of contact to determine how to proceed.

4.3 FORMAL INVESTIGATION AND REPORT

1. When a formal investigation is begun the Provost will appoint an Investigation Committee:
 - a. The chair of the Investigation Committee will be a Vice-Provost, Associate Vice-President, Dean, or Director who reports to the Provost or the Vice-President Research.
 - b. The remainder of the Investigation Committee will be made up of between two and four tenured TRU faculty members and one external member who has no current affiliation with TRU.
 - c. All members should have the necessary expertise to assess the allegations and have no perceived or real conflicts of interest.
2. The Investigation Committee has the authority to decide whether a breach has occurred. The Investigation Committee may review any information relevant to the allegation. They may interview any relevant member of the University Community during their investigation.
3. Both the Complainant and Respondent will be provided an opportunity to be heard by the Investigation Committee. The Respondent will be entitled to see and make submissions regarding all information considered by the Investigation Committee.
4. The Respondent and Complainant have the right to a support person of their choosing to assist during the Formal Investigation who may have access to all information available to them provided that it must be kept confidential. Members of unions and employee associations have the right to representation that their collective agreement confers.
5. All those involved in the Formal Investigation will agree to confidentiality about the allegations, investigation, and proceedings.
6. At the conclusion of a formal investigation the Investigation Committee will prepare and sign a report which includes:
 - a. a summary of the allegations and responses;
 - b. their decision on the matter with specific reasons; and
 - c. a recommendation of sanctions, if any, or recommended actions to protect or restore the reputation of the Respondent.
7. This report will be provided to both the Provost and the Respondent normally within 60 working days of the commencement of the formal investigation.
8. The Provost will determine any sanctions based on the recommendation of the Investigation Committee normally within 20 working days of receiving the report will and



send a copy of the report and the Provost's decision to the Respondent, President and the relevant Deans or Directors of those involved in the allegation.

4.4 SANCTIONS

1. Sanctions for Scholarly Misconduct will be determined by the Provost on the recommendation of the Investigation Committee and will depend on the severity of the offense.
2. If sanctions are to be imposed, the Provost will provide the Respondent an opportunity to be heard or to provide further information prior to their final decision regarding a sanction.
3. Any disciplinary action to be taken against an employee of TRU under this policy is subject to the applicable employee agreement and legislation that apply to that employee.

4.5 APPEAL

1. **Appeal of process:** Within 10 working days of receiving the report and Provost's decision on sanctions, the Respondent may appeal the process of the investigation to the President. Grounds for such appeals shall be limited to procedural matters such as failure to follow this policy or the RCR. Should the President find in favour of the Respondent, a new Investigation Committee with new membership will be convened to conduct a new investigation.
2. **Appeal of discipline:** Respondents with applicable grievance procedures in their collective agreement or terms and conditions of employment may appeal discipline that is imposed under this policy and is subject to their collective agreement or terms and conditions of employment, through the relevant grievance procedure.

5 REPORTING

Subject to the Freedom of Information and Protection of Privacy Act TRU will advise the appropriate agency, organization, or to the Secretariat on Responsible Conduct of Research of allegations in alignment with RCR Reporting Requirements (4.4) and the relevant agency or organization policies. Timelines for reporting will align with RCR. TRU will report annually on all allegations and confirmed breaches of this policy to the SRCR and will post a report annually on the TRU website with the number of and general information on findings of breaches.

6 CONFIDENTIALITY AND PRIVACY

Enquiries, allegations of breaches of policies and information related to allegations will be handled confidentially subject to the BC Freedom of Information and Protection Privacy Act, RCR, and relevant policies and legislation. The privacy of Complainant(s) and Respondent(s) will generally be protected, but a Respondent is normally entitled to know the identity of the Complainant.

TRU's public annual report on confirmed misconduct and actions taken is not a violation of confidentiality.

7 ASSOCIATED POLICIES

Other TRU policies that affect this include but are not limited to:

- Biosafety and Biosecurity ADM 25-0
- Care and Use of Animals in Research and Teaching BRD 21-1
- Conflict of Interest ADM 4-2
- Public Interest Disclosure BRD 29-0
- Records Retention/Destruction ADM 2-3 and associated Records Retention Schedule
- Research Ethics Board ED XX-X
- Whistleblower BRD 18-0

DRAFT - for consultation purposes