Research Compliance
A refresher
Outline

• Rationale
• UM Policies
  • Code of Research Ethics
  • Responsible Conduct of Research Policy
  • Investigation Procedures
• Mitigation
• Ethics (human and animal) and Biosafety
• Consequences
The Mandate

Responsible Conduct of Research (RCR)

• In 2016 the federal government, via the Tri-Agencies (CIHR, NSERC, SSHRC), mandated that universities:
  • develop policies and procedures in respect of the responsible conduct of research
  • undertake educational activities regarding RCR

• Breaches involving Tri-Agency funded research are reported to the Secretariat on Responsible Conduct of Research (SRCR)
Code of Research Ethics

• Defines the expectations for researchers in the context of the responsible conduct of research

• The Code of Research Ethics has several components:
  • academic rigour
  • attribution
  • conflict of interest
  • funding agencies
  • supervision of research
  • code not exhaustive
Responsible Conduct of Research Policy

• Defines the expectations regarding responsible conduct of research

• Defines
  • “breach”
  • “designated officer”
  • “investigation”

• Ensures that funding agencies have confidence in research at the UM and that funds allocated to research at UM are used responsibly
RCR - Investigation Procedure

Reasons for Procedure

• Researchers are expected to conduct Research in accordance with the University's Code of Research Ethics and the Responsible Conduct of Research Policy, and to uphold the following responsibilities:
  • accurate referencing
  • acknowledgment
  • authorship
  • conflict of Interest
  • record keeping
  • rigour
RCR - Investigation Procedure

“Breach”

• means conduct, behaviour, actions or omissions which are inconsistent with or violate the Code of Research Ethics.

• Innocent errors and oversights may constitute a Breach, but intention will be considered in regard to any penalty, discipline or other measures taken following an Investigation.
RCR - Investigation Procedure

“Breach”

- Can include (but not limited to):
  - breach of funding agency policies/requirements
  - conflict of interest and confidentiality policies
  - copyright breach
  - research record mismanagement
  - fabrication or falsification
  - plagiarism
  - inadequate acknowledgement
  - invalid authorship
  - Inaccurate information on funding applications
RCR - Investigation Procedure

“Designated Officer”

• The person to whom breaches must be reported
• At UM, this is the Vice-President (Research and International)
• Responsible for the initial review of the allegation
• Decides (within 15 working days of receipt of an alleged breach) whether the disclosure was made in good faith and requires investigation or was frivolous or vexatious.
RCR - Investigation Procedure

“Investigation Committee”

• A minimum of three individuals, one of whom must be a community (lay) representative. The Chair of this committee will be identified by the Designated Officer from among this group.

• Can add additional representatives if the allegation involves a graduate student, post-doctoral fellow, research associate, etc.

• Majority of the committee must be UMFA members (including academic administrators)
RCR - Investigation Procedure

• The researcher alleged to have breached the policy is entitled to representation by the appropriate bargaining unit or other person of their choosing

• They will have the opportunity to address the allegations

• Investigations will normally be completed within 90 days however extensions may be granted by the Designated Officer

• All investigations are conducted in compliance with the principles of procedural fairness and natural justice as well as any existing collective agreements
RCR - Investigation Procedure

Discipline

• If the finding of the Investigation Committee is that a breach occurred and if all appeals have been exhausted, then the Designated Officer, the Provost and Vice-President Academic, and the appropriate Dean/Director/Unit Head will meet and determine any disciplinary action(s)
RCR - Investigation Procedure

Consequences

• UM disciplinary actions as per any collective agreements in place

• If the breach involves Tri-Agency funded research, the breach is reported to the SRCR which then reports it to the relevant Tri-Agency, that may enact their own disciplinary actions, which may include prohibition from applying to the Tri-Agencies for a period of time or never as well as not serving as reviewer or on review panel.

• This discipline is separate from and in addition to, any university discipline that may be applied.
Mitigation

FAAF

- The Funding Application Approval Form (FAAF) form – ensures that Department Heads, Deans/Directors, and ORS staff are aware of and sign off on, research applications
- PI is responsible for the accuracy of FAAF
- ORS ensures that all required compliance approvals are, or will be, in place at the time funds are awarded and expanded
- Determines where the research will be conducted
Mitigation (cont’d)

FAAF

• Please note the new wording on this form:

“Submitting inaccurate or false information in these forms IS a breach of the University of Manitoba Responsible Conduct of Research Policy.”
Mitigation (cont’d)

FAAF

- MUST declare ALL financial conflicts of interest – income from other universities, industries, or sponsors

- MUST declare all appointments at other educational institutions, industries, or sponsors – world wide
Mitigation (cont’d)

Research Integrity Online

• Purchased from Oxford University Press
• Available free for UM faculty, staff and students
• 4-5 hours to complete
• Covers the most common pitfalls that researchers can face
Mitigation (cont’d)

iThenticate

• Plagiarism detection software for research-related publications
• For faculty and graduate student use
• Person submitting document to iThenticate MUST be an author or co-author
• Strongly recommended for all research proposals, draft manuscripts, theses and final manuscripts ready for submission
Human Ethics

• Must first complete the Tri-Agency C.O.R.E. course online (Course on Research Ethics)
• Submit protocol to the appropriate ethics office:
  • Shelly Rempel-Rossum (Bannatyne), or
  • Pinar Eskicioglu (Ft. Garry)
Human Ethics

- Will be reviewed by a REB
  - Bannatyne Campus (2 of)
  - Ft. Garry Campus (3 of)
- Projects can be monitored post-approval on a risk basis with higher risk projects receiving more monitoring.
- A full audit may occur if there are adverse events, problems or if the project is very high risk.
- **NB:** Any work involving human participants – *even if conducted in another country* – requires REB review and approval.
- If a UM researcher is involved, the same requirements apply to research at all locations including in outer space.
- Research involving animals requires animal ethics approval.
Human Ethics

Consent (ICF)

• May only do what is explicitly stated on the Consent Form with respect to:
  • procedure
  • data storage, handling, transfer
  • etc.

• Cannot deviate unless an amendment to ethics is obtained and participants reconsent (if applicable)
Animal Ethics

- Must first complete the Animal User Training Course
- Submit protocol to the animal ethics coordinator, Tracy van Osch
- Reviewed by Animal Care Committees (Ft. Garry and Bannatyne campuses)
Animal Ethics

- Post-approval monitoring by vet staff and/or animal health technicians.
- UM subject to periodic inspection/site visits by the Canadian Council on Animal Care (CCAC)
Biosafety

- Research programs now receive certification from the Biosafety Office (Steve Cole)
- Once program approval is obtained, and as long as the risk group agents do not change, certification is maintained
- Subject to periodic lab inspection by the staff of the biosafety office (EHSO)
## Breach Penalties
*(from SSCR files)*

<table>
<thead>
<tr>
<th>Breach</th>
<th>Agency Penalty</th>
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<tbody>
<tr>
<td>Fabrication</td>
<td>• terminated grant</td>
</tr>
<tr>
<td></td>
<td>• ineligible to apply for 5 years</td>
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<tr>
<td>Plagiarism</td>
<td>• terminated grant</td>
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<tr>
<td></td>
<td>• ineligible to apply/hold for life</td>
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<tr>
<td>Misrepresentation in application</td>
<td>• ineligible to apply for 2 years</td>
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<tr>
<td>Mismanagement of funds</td>
<td>• repay ineligible expenses</td>
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<tr>
<td></td>
<td>• terminated grant</td>
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<tr>
<td></td>
<td>• ineligible to apply/hold for life</td>
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<tr>
<td>Failure to comply with Agency policies</td>
<td>• terminated grant</td>
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<tr>
<td></td>
<td>• ineligible to apply/hold for 3 years</td>
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