

**HEC MONTRÉAL**

**Politique sur la conduite  
responsable de la recherche**

**Policy for the Responsible  
Conduct of Research**

**Adoptée par le Conseil pédagogique**

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## **Preamble:**

HEC Montréal is accountable to society for the integrity of its researchers. This policy sets out the principles, rules and procedures relating to the responsible conduct of research. Researchers are expected to apply the best research practices honestly, responsibly, openly and equitably in the production and dissemination of knowledge. Moreover, they are required to comply with all applicable policies at HEC Montréal, with professional or disciplinary standards, and with all laws and regulations in effect.

This policy applies to researchers employed by HEC Montréal as well as to students registered in any of its programs. Accordingly, the term “researcher” as used herein refers to both researchers employed by HEC Montréal and its students.

The *Regulation regarding the Intellectual Integrity of the Students (Règlement sur l'intégrité intellectuelle des étudiants)* takes precedence over this policy in the case of academic violations related to courses taken by students or the writing of a supervised project report, master's thesis or doctoral thesis.

## **1. Application of Best Research Practices**

### **1.1 Research Integrity Best Practices**

1.1.1 At a minimum, researchers are responsible for the following with respect to research integrity:

- a. 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;
- b. 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 allows verification or replication of the work by others;
- c. Referencing and, where applicable, obtaining permission for the use of all published and unpublished work, including data, source material, methodologies, findings, graphs and images;
- d. 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 with the authorship policies of relevant publications;
- e. Acknowledging, in addition to authors, all contributors and contributions to research, including writers, funders and sponsors;
- f. Appropriately managing any real, potential or perceived conflict of interest in accordance with HEC Montréal's Policy on Conflicts of Interest in Research.

## **1.2 Applying for and Holding Research Funds**

- 1.2.1 Applicants and holders of grants, awards or any other research funds shall provide 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.
- 1.2.2 When submitting an application for funding, applicants shall certify that they are not ineligible to apply for, and/or hold, funds from any granting agency or other organization that funds research, whether in Canada or abroad, for reasons of breach of responsible conduct of research policies, including policies concerning ethics, integrity or financial management.
- 1.2.3 Principal funding applicants must ensure that others listed on the application have agreed to be included.

## **1.3 Management of Research Funds**

- 1.3.1 The funds granted to researchers shall be used exclusively for research purposes. Researchers are responsible for using grants, awards or any other research funds in accordance with the policies of the funding agencies, including the Tri-Agency Financial Administration Guide and Tri-Agency grants and awards guides, or any other organization that funds research or any other rules imposed by HEC Montréal. Researchers shall also provide true, complete and accurate information on documentation for expenditures from research fund accounts.

## **1.4 Tri-Agency Requirements Regarding Compliance with Regulations**

- 1.4.1 Researchers must comply with all applicable agency requirements and legislation for the conduct of research, including, but not limited to:
  - 2<sup>nd</sup> edition of the Tri-Council Policy Statement: Ethical Conduct of Research Involving Humans (TCPS 2);
  - Canadian Council on Animal Care Policies and Guidelines;
  - Agency policies related to the Canadian Environmental Assessment Act;
  - Licences for research in the field;
  - Laboratory Biosafety Guidelines;
  - Controlled Goods Program;
  - Canadian Nuclear Safety Commission (CNSC) Regulations;
  - Canada's Food and Drugs Act.

## **1.5 Promoting Awareness and Education**

1.5.1 The institution shall be responsible for:

- a. Promoting awareness of what constitutes the responsible conduct of research, including agency requirements as set out in the institution's policies, the consequences of failing to meet those requirements, as well as the process for addressing allegations, to all those engaged in research activities at the Institution;
- b. Communicating its policy on the responsible conduct of research within the Institution, and making public annual statistical reports on confirmed findings of breaches of that policy and actions taken, subject to the applicable laws, including the privacy laws;
- c. Communicating the identity of the central point of contact within the Institution who is responsible for receiving confidential enquiries, allegations and information related to allegations of breaches of Agency policies.

## **2. Breaches of Best Research Practices**

### **2.1 Breaches of Minimal Responsibilities Respecting Research Integrity by Researchers**

2.1.1. Breaches of minimal responsibilities with respect to research integrity by researchers include, without being limited to, the following:

- 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, which falsifies the findings or conclusions;
- c. *Destruction of research records*: The destruction of one's own or another person'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 person'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 without permission, where required;
- e. *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 acknowledgement of the source or without justification;
- f. *Invalid authorship*: Inaccurate attribution of authorship, including attribution of authorship to persons other than those who have contributed sufficiently to take responsibility for the

intellectual content, or agreeing to be listed as author to a publication to which one made little or no material contribution;

- g. *Inadequate acknowledgement*: Failure to appropriately recognize contributions of others in a manner consistent with their respective contributions and with the authorship policies of the relevant publications. Inadequate acknowledgement also includes omitting mention of the source of financial support of one's research activities, as required by funding agencies;
- h. *Mismanagement of conflicts of interest*: Failure to appropriately manage any real, potential or perceived conflict of interest. In this regard, researchers shall refer to HEC Montréal's Policy on Conflicts of Interest in Research.
- i. *Multiple submissions*: The simultaneous submission of an article to more than one scientific or trade journal.

## **2.2 Misrepresentation in an Application for Funding**

2.2.1 Breaches of minimal responsibilities with respect to applications for a grant, award or any other research fund include, without being limited to, the following:

- a. Providing incomplete, inaccurate or false information in an application for a grant, award or any other research fund 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 any funding agency, whether in Canada or abroad, for reasons of breach of responsible conduct of research policies, including policies concerning ethics, integrity or financial management;
- c. Listing co-applicants, collaborators or partners without their consent.

## **2.3 Mismanagement of Research Funds**

2.3.1 Breaches of minimal responsibilities with respect to the management of research funds include, without being limited to, the following:

- a. Using research funds for purposes other than research or for purposes inconsistent with the policies of the funding agencies or HEC Montréal;
- b. Misappropriating research funds, contravening the financial policies of the funding agencies, namely the Tri-Agency Financial Administration Guide and Tri-Agency grants and awards guides, the financial policies of the Fonds de recherche du Québec, or the rules established by any other organization that funds research or any other rules imposed by HEC Montréal;
- c. Providing incomplete, inaccurate or false information on documentation for expenditures from research fund accounts.
- d. Destroying relevant documents prior to the appropriate time.

## **2.4 Breaches of Agency Requirements Regarding Compliance with Regulations**

2.4.1 Breaches of policies concerning certain types of research include, without being limited to, the following:

- a. Failing to meet agency policy requirements or to comply with relevant policies, laws or regulations requiring clear and mandatory instructions for the conduct of certain types of research activities;
- b. These requirements may relate to applicable legislative provisions, such as the Civil Code of Québec, or to recognized rules or standards such as animal protection, laboratory biosafety, the respect of environmental standards and codes of conduct. When these research activities are conducted outside of Québec, the legislative provisions shall be respected, both within the Canadian institution and those of another country or where the research takes place, and local standards shall be taken into account;
- c. Not respecting confidentiality agreements;
- d. Failing to obtain appropriate approvals, permits or certifications before conducting research activities;
- e. Adversely affecting the integrity of a scientific peer-review process and the granting of funds;
- f. Making false or misleading accusations.

## **3. Addressing Allegations of Breaches**

### **3.1 Receiving Allegations**

- 3.1.1 Any individual who has knowledge of a situation that could constitute a breach under Article 2 can report it to the Director of Research. Such an allegation may also be submitted by a funding agency.
- 3.1.2 The allegation may concern one or more researchers.
- 3.1.3 The Director of Research shall protect the identity of the complainant who requests it.
- 3.1.4 In the event that the allegation concerns the Director of Research, it shall be referred directly to the Director.
- 3.1.5 The Director of Research or, in his/her absence, the Director, may take immediate action, before or during the inquiry, notably if there is a threat to the safety or security of any individual, if there is a risk of agency funds being misappropriated, of School property being damaged or of damage to the School's reputation. The Director of Research or, in his/her absence, the Director, may also take immediate action to protect the reputation of the persons involved.

- 3.1.6 The Director of Research shall transfer any allegation of an academic violation related to courses taken by a student or the writing of a supervised project report, master's thesis or doctoral thesis to the director of the program of the student concerned.
- 3.1.7 The Director of Research shall conduct an initial inquiry to determine whether there is a credible basis for the allegation. He/she must appoint, at this preliminary stage, a full professor from a department other than that of the person who is the subject of the complaint and that of the complainant. He/she may reject a manifestly unfounded claim, or accept to receive the responsible allegation and to refer it to an investigation committee as stipulated in Article 3.2.1.
- 3.1.8 If the allegation is rejected after being deemed to be manifestly unfounded, the complainant shall be notified in writing within twenty (20) days of submission of the allegation. The Director of Research shall make every effort to protect or restore the reputation of the individuals wrongly subjected to the allegation.
- 3.1.9 Anonymous allegations shall be addressed in accordance with the procedures described in this section, while making the necessary adjustments.

## **3.2 Investigating Allegations**

- 3.2.1 If the allegation is determined to be responsible, the Director of Research shall convene an investigation committee to handle the complaint.
- 3.2.2 In the case of an allegation related to activities with a tangible funding link only to the Fonds de recherche du Québec, the Director of Research may decide not to call an investigation committee if, after having heard from the person who is the subject of the complaint, the facts are clear (e.g., when the person who is the subject of the complaint recognizes the allegations or the complaint investigation provides no new facts with regard to the allegation). The Director of Research shall then deal with the complaint in conformance with Section 3.3, with the necessary adjustments.
- 3.2.3 The investigation committee shall be appointed by the Director, who shall also designate its chairperson. This committee shall be composed of two full professors at HEC Montréal and one external member who is not affiliated with the School. In the case of a complaint against an FRQ-funded researcher, one of the HEC Montréal professors shall be in the same field of research or have the same professional expertise as the person who is the subject of the complaint.
- 3.2.4 The Director of Research shall ensure that the members of the committee are not in a potential conflict of interest with the person who is the subject of the complaint and/or with the complainant.
- 3.2.5 The Director of Research shall have thirty (30) days from the date of receipt of the complaint in which to convene an investigation committee. Upon its appointment, the investigation committee shall act with diligence.
- 3.2.6 The person who is the subject of the complaint shall be given written notice of the substance of the complaint. This person shall also be informed of his/her obligation to withdraw from any federal funding organization evaluation process, as prescribed in the Conflict of Interest and Confidentiality

Policy of the Federal Research Funding Organizations, and to not accept participation in such a process while the investigation is ongoing.

- 3.2.7 As part of its mandate, the investigation committee may take any steps necessary to obtain the information required for its investigation. It shall keep a register of all documents it receives.
- 3.2.8 The person who is the subject of the complaint shall be given the opportunity to be heard both in person and in writing by the investigation committee.
- 3.2.9 In the process of handling allegations, the principles of confidentiality and the presumption of innocence must be respected. The individuals investigating complaints shall protect the privacy of both the respondent and the complainant. They shall sign a confidentiality agreement to this effect. All documents and information provided to the committee shall be confidential.
- 3.2.10 The investigation committee shall submit its report to the Director of Research within sixty (60) days of its completion of the investigation. The report shall provide details of the complaint, the evidence presented, its findings with respect to the merits of the allegation, and, if applicable, recommendations to avoid similar situations in the future.

### **3.3 Decisions on Misconduct**

- 3.3.1 In the event that the investigation committee finds the allegation to be unfounded, the Director of Research shall close the file and inform the person who is the subject of the allegation as well as the complainant of the committee conclusions. The Director of Research shall take the necessary steps to safeguard or restore, as the case may be, the reputation of the persons involved.
- 3.3.2 In the event that the investigation committee finds the allegation to be substantiated, the Director of Research shall forward the investigation committee's report and relevant documentation to the Director of Faculty Affairs, along with a recommendation of appropriate sanctions. If the person who is the subject of the allegation is a student, the expression "*Director of Faculty Affairs*" in this section shall be replaced, if applicable, by "*Director of the Academic Programs*."
- 3.3.3 Before imposing a sanction, the Director of Faculty Affairs shall take into consideration the nature and severity of the alleged misconduct. He/she shall also give the person who is the subject of the allegation the opportunity to comment on the sanction.
- 3.3.4 The main sanctions that can be imposed on an employee of the School include: a warning, suspension of access to research grants, suspension or dismissal. The Director of Faculty Affairs may also impose any other sanction deemed appropriate, including:
  - issuing a letter of concern to the researcher;
  - requesting that the researcher correct the research record and provide proof that the research record has been corrected;
  - advising the researcher that the Research Office will not accept applications for future funding from him/her for a defined time period or indefinitely;

- terminating remaining instalments of the grant, award or any other research fund;
- seeking a refund of all or part of the funds already paid within a defined timeframe.

Any person affected by a prohibition of requesting or receiving funds from a funding agency shall withdraw from any federal funding organization evaluation process, as prescribed in the Conflict of Interest and Confidentiality Policy of the Federal Research Funding Organizations, and to not participate in such a process while the investigation is ongoing.

The main sanctions that can be imposed on a student of the School in the event of a breach of this policy are: a warning, suspension of access to funding awarded by HEC Montréal or any other funding agency, the obligation to redo the research in accordance with this policy, or the obligation to redo all or part of a supervised research report, master's thesis or doctoral thesis, or permanent suspension or expulsion from HEC Montréal, in which case this student would be prevented from being admitted or readmitted to a program or enrolling in a course at HEC Montréal, or from obtaining a degree, diploma or certificate. Any other sanction deemed appropriate may also be applied.

- 3.3.5 In the case of a dismissal, prior to imposing the sanction, the Director of Faculty Affairs may confer with the Human Resources Department. All decisions involving the dismissal of a professor must be authorized by HEC Montréal's Board of Directors.
- 3.3.6 In addition to, and independently of, the sanctions imposed by HEC Montréal, the researcher may also be subject to sanctions imposed by any of the funding agencies.
- 3.3.7 Professors must include any notice of sanction in all future applications for promotion, in the section concerning research. The Director of Research may include the notice of sanction in a candidate's application for promotion if the latter fails to do so.
- 3.3.8 The Director of Research may request that the decision regarding an application for promotion be suspended pending the completion of the investigation committee's report or the dismissal of the allegation, or, in the case of disciplinary action, pending the expiration of the appeal deadline or the completion of the appeal process.
- 3.3.9 At the end of the process, the Director of Faculty Affairs shall inform the person who is the subject of the allegation of the sanction to be imposed. He/she may inform the complainant that the investigation has been completed and a finding made, but is not required to inform him/her of the sanction imposed.
- 3.3.10 A person who is found guilty of a breach of this policy may request a review of the finding and the sanction by a research integrity appeal committee. The appeal committee shall be composed of three members, mainly HEC Montréal faculty members, appointed by the Director, who shall also designate one of these members to act as chairperson. The application for review must be submitted to the Director of Research no later than thirty (30) days following receipt of the notice of sanction.
- 3.3.11 The application for review shall be analyzed on the basis of the file as it stands. The research integrity appeal committee shall present its conclusions and recommendations to the Director. Upon

receiving the Appeal Committee's recommendations, the Director shall render a decision he/she deems appropriate on the decision made by the investigation committee and on the sanction imposed. He/she shall then inform the person who is the subject of the complaint. The Director's decision shall be final and binding.

#### **4. Information to be Provided to Federal Granting Agencies**

- 4.1 Subject to any applicable laws, including privacy laws, the Research Office shall immediately advise the relevant granting agency or the Secretariat on Responsible Conduct of Research (SRCR) of any allegations related to activities funded by the agency that may involve significant financial, health and safety, or other risks. The SRCR is a federal agency that notably provides substantive and administrative support for the Panel on Responsible Conduct of Research (PRCR), and for the three federal research granting agencies with respect to the Tri-Agency Framework: Responsible Conduct of Research.
- 4.2 The Research Office shall write a letter to the SRCR confirming whether or not the Institution is proceeding with an investigation where the SRCR was copied on the allegation or advised as per the previous section. If a breach is confirmed at the investigation stage, reporting requirements outlined in the following section.
- 4.3 The Research Office shall prepare a report for the SRCR on each investigation it conducts in response to an allegation of policy breaches related to a funding application submitted to an agency or to an activity funded by an agency. Subject to any applicable laws, including privacy laws, each report shall include the following information:
- the specific allegation(s), a summary of the finding(s) and reasons for the finding(s);
  - the process and time lines established for the inquiry and/or investigation;
  - the researcher's response to the allegation, investigation and findings, and any measures the researcher has taken to rectify the breach;
  - the investigation committee's decisions and recommendations and the actions taken by the Institution.
- 4.4 The Research Office's report should not include:
- information that is not related specifically to agency funding and policies; or
  - personal information about the researcher, or any other person, that is not directly related to the institution's findings and its report to the SRCR.
- 4.5 Inquiry letters and investigation reports should be submitted to the SRCR within two and seven months, respectively, of receipt of the allegation by the institution. These deadlines may be extended in consultation with the SRCR if circumstances warrant, and with monthly updates provided to the agency until the investigation is complete.

- 4.6 The Institution and the researcher may not enter into confidentiality agreements or other agreements related to an inquiry or investigation that prevent the institution from reporting to the agencies through the SRCR.
- 4.7 In cases where the source of funding is unclear, the SRCR reserves the right to request information and reports from the Institution.

## **5. Information to be Provided to the Fonds de recherche du Québec**

- 5.1 When an allegation of a violation of Article 2 of this policy deals with activities with a tangible funding link to the Fonds de recherche du Québec (FRQ), the Research Office shall be obliged to inform the FRQ of this at certain stages of the process.
- 5.2 The Research Office shall inform the FRQ immediately if urgent action by the institution becomes necessary. The Fonds involved shall communicate with the institution to evaluate if immediate action by the FRQ is also appropriate. It shall then be necessary to provide the FRQ with the identity of the person against whom the allegation was filed, notwithstanding the above.
- 5.3 The Research Office shall send a letter to the director of the FRQ's Legal and Ethics office regarding the admissibility of an allegation within two months of receipt of the complaint. This letter shall not include personal data about the persons involved in the allegation. The letter shall include the following elements:
- a) the unique file identification number;
  - b) the nature of the allegation;
  - c) the date of receipt of the complaint;
  - d) the status of the persons involved in the complaint (researcher, student, research staff, funding manager, research project participant, REB, etc.);
  - e) the need for immediate action, if such is the case (so that harm, risk to participants, etc. may realistically be avoided);
  - f) the admissibility of the allegation and the start of an investigation of the complaint, or the inadmissibility of the allegation and reason why the complaint has been rejected;
  - g) the composition of the committee mandated to examine the complaint, if any;
  - h) if an accelerated procedure was used, the reasons justifying the adoption of such a procedure.
- 5.4 If, upon completing its investigation, the investigation committee finds the allegation to be unfounded, the Research Office shall send a letter to the FRQ with the following information:
- a) the unique file identification number;
  - b) the names of the committee members and their specializations supporting the pertinence of their nomination, to ensure the appropriate composition of the committee (expertise, function or status);
  - c) the timeline of the process as well as any feature demonstrating that the internal process as prescribed by the institutional policy was followed;
  - d) the findings of the investigation, specifying the reason for rejecting the allegation of a breach.

5.5 If, upon completing its investigation, the investigation committee finds the allegation is substantiated, the Fonds in question shall be informed. The Research Office shall send a full copy of the committee report to the director of the FRQ's Legal and Ethics office, shall inform the researcher funded by the FRQ, the fund recipient, research staff or the granting agency manager of this action. The identity of the persons involved shall then be made known to the FRQ. The complete and unabridged report shall be provided to the FRQ, specifying:

- a) the unique file identification number (8.1.a);
- b) the name of the person who is the subject of the complaint;
- c) the names of the committee members and their specializations supporting the pertinence of their nomination, to ensure the appropriate composition of the committee (expertise, function or status);
- d) the timeline of the process as well as any feature demonstrating that the internal process as prescribed by the institutional policy was followed;
- e) the actions requested by the institution pending the conclusions of the report;
- f) the comments of the respondent;
- g) the comments of the complainant;
- h) the conclusions of the investigation clearly stating that a breach of responsible conduct occurred;
- i) the evaluation of the repercussions of this breach, if one has occurred, allowing for an assessment of its seriousness. The impacts on the following elements can be taken into account:
  - Research participants, animals or the environment;
  - Scientific knowledge in the field involved;
  - Teams, students, colleagues, partners and institutions;
  - Public confidence in scientific research activity and the scientific community;
  - The credibility of Québec's scientific community.
- j) recommendations (or a final decision, depending on the institutional policy) on the sanctions and remedies aimed at rectifying the harm done or the scientific facts, as the case may be.

5.6 If the Director of Research decides not to strike an investigation committee under Article 3.2.2., the Research Office shall inform the FRQ in the manner indicated in Section 5.5, with the necessary adjustments.