

Policy for the Responsible Conduct of Research

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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.

Responsible conduct of research is the behaviour expected of anyone who conducts or supports research activities at any stage of a research project, be it formulating the research question, planning and conducting the research, collecting data, analysing the research and properly managing research funds. This behaviour implies that researchers know and are applying the established professional standards as well as the values and ethical principles that are essential to conducting all research-related activities. Such values include honesty, equity, trust, responsibility and open mindedness.

This policy applies to researchers employed by HEC Montréal as well as to students who have been admitted to one of its programs. Accordingly, the term “researcher” as used herein refers to both researchers employed by HEC Montréal and its students.

The Regulation on Student Intellectual Integrity takes precedence over this policy in the case of academic violations related to courses 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. Rigour: Using a high level of intellectual and scientific rigour in proposing and performing research; in recording, analyzing, and interpreting data and in reporting and publishing data and findings
- b. Record keeping: Keeping complete and accurate records of data, methodologies and findings, including graphs and images, in accordance with the applicable funding agreement, HEC's policies, laws, regulations, and professional or disciplinary standards in a manner that allows verification or replication of the work by others
- c. Precise referencing: Providing references and, where applicable, obtaining permission for the use of all published and unpublished work, including theories and concepts, data, source material, methodologies, findings, graphs and images
- d. Attributing author status: With their consent, presenting as authors all persons who made a significant contribution to the content of the publication or document and accept responsibility thereof, and only these persons; a significant contribution can be conceptual or tangible
- e. Acknowledgements: Properly acknowledging all contributors to the research, including funders and sponsors, and only these persons
- f. Managing conflicts of interest: Recognizing and properly resolving any real, potential or perceived conflicts of interest as stipulated in HEC Montréal's Policy on Conflicts of Interest in Research to ensure the objectives of the framework are met.

1.2 Applying for and holding research funds

- 1.2.1 Researchers and holders of grants, awards or any other research funds must 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 Researchers may only request funding from an organization if they are not currently ineligible to request or hold funds from the NSERC, SSHRC, CIHR or any other research funding organization, whether in Canada or abroad, for reasons of breach of a responsible conduct of research policy, including a policy concerning ethics, integrity, or financial management.

1.2.3 Researchers 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 must 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 must also provide true, complete and accurate information on documentation for expenditures from research fund accounts.

1.4 Requirements regarding compliance with regulations

1.4.1 Researchers must comply with all applicable agency requirements and legislation for the conduct of research including:

- 2nd 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 Rectifying the situation in case of a violation

1.5.1 Researchers who violate the policies of organizations must react proactively to rectify the situation, for example, by correcting the research record, sending an apology letter to all persons affected by the violation, or reimbursing the funds.

1.6 Participating in an organization's review process

- 1.6.1 Any person acting as an external evaluator must comply with the Conflict of Interest and Confidentiality Policy of the Federal Research Funding Organizations.
- 1.6.2 Persons acting as an external examiner or reviewer certify that they are not currently under investigation for an alleged violation of the Terms of Reference or any other policy on the responsible conduct of research, such as a policy on ethics, integrity or financial management.
- 1.6.3 If they are under investigation, these persons must temporarily withdraw from any review process of an organization until the investigation has ended and the organization has determined that they can resume participation.

1.7 Promoting awareness and education

- 1.7.1 All researchers are responsible for knowing the principles of responsible conduct in research, and for applying them to ensure a positive, constructive research environment. These persons in a supervisory role must provide appropriate supervision of their interns and research staff and raise their awareness about the responsible conduct of research.
- 1.7.2 HEC Montréal will also be responsible for:
 - a. Promoting awareness of what constitutes the responsible conduct of research, including agency requirements as set out in HEC Montréal 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 HEC Montréal
 - b. Communicating its policy on research integrity at HEC Montréal
 - c. Communicating the identity of the central point of contact within HEC Montréal 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 Breach of a researcher's minimal responsibilities regarding research integrity

- 2.1.1 A breach is the failure to comply with any Agency policy at any stage of a research project, from applying for funds to conducting research and disseminating results.
- 2.1.2 To determine if a person has violated an Agency policy, whether the violation was intentional or a good-faith mistake is not taken into account. However, intention is taken into account when deciding the severity of sanctions to be applied.
- 2.1.3 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 appropriate acknowledgement, such that the work is not accurately represented
 - c. *Destruction of data or research records:* The destruction of one's own or another person's research data or records or in contravention of the applicable funding agreement, HEC Montréal's policies and/or laws, regulations and professional or disciplinary standards; this also includes the destruction of data or files to avoid detection of wrongdoing
 - 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 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 without justification

- f. *Attributing author status*: Inappropriately presenting persons as authors, in particular anyone other than those who made a significant contribution to the content of the publication or document and accept responsibility thereof
- g. *Inadequate acknowledgement*: Failure to appropriately recognize contributions of others in a manner consistent with their respective contributions and the relevant publication's requirements; 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 recognize and resolve any real, potential or perceived conflict of interest; in this regard, researchers must 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 a researcher's 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 a research policy, including a policy concerning ethics, integrity or financial management
 - c. Including the name of another person as a co-candidate, collaborator or partner without their consent.

2.3 Mismanagement of research funds

- 2.3.1 Breaches of a researcher's minimal responsibilities with respect to the management of research funds:

- 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 must be respected, both within HEC Montréal and in another country or where the research takes place, and local standards will be taken into account.
- c. Failing to respect 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.

2.5 Breach of an agency's review process

2.5.1 The following also constitute violations:

- a. Failure to comply with the Conflict of Interest and Confidentiality Policy of the Federal Research Funding Organizations.
- b. A person's participation in an agency's peer review process while they are under investigation.

3. ADDRESSING ALLEGATIONS OF BREACHES

3.1 General

- 3.1.1 HEC Montréal researchers and staff play important roles in the process of examining allegations of policy breach and contribute to ensuring such allegations are addressed in an appropriate and timely manner.
- 3.1.2 If the allegation relates to conduct that occurred in another institution (be it as an employee, student, or another title), the institution that receives the allegation will communicate with the person in charge of responsible research conduct at the other university to determine which institution is best placed to conduct an investigation, if applicable. The institution that receives the allegation must tell the complainant which establishment to communicate with regarding the allegation.
- 3.1.3 The Research and Knowledge Transfer Office provides the complainant with information regarding the processing of their complaint at each step of the process, including the result of the initial inquiry and, if applicable, the investigation. No information on a possible sanction can be shared with the complainant.

3.2 Receiving breach allegations

- 3.2.1 Any individual who has knowledge of a situation that could constitute a breach under Article 2 can report it to the Director of Research and Knowledge Transfer. Such an allegation may also be submitted by a funding agency.
- 3.2.2 The complaint can target one or more researchers.
- 3.2.3 The Director of Research and Knowledge Transfer must protect the identity of a complainant who wishes to remain anonymous.
- 3.2.4 Should the complaint target the Director of Research and Knowledge Transfer, it will be sent directly to the director of HEC Montréal.
- 3.2.5 The Director of Research and Knowledge Transfer or, in their absence, the Director of HEC Montréal, may impose immediate sanctions, 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 HEC Montréal property being damaged or of damage to HEC Montréal's reputation. The Director of Research and Knowledge Transfer or, in their absence, the Director of HEC Montréal, may also take immediate action to protect the reputation of the persons involved.
- 3.2.6 The Director of Research and Knowledge Transfer sends the student's program director any complaint regarding an allegation of academic violation related to the student's courses, supervised project report, thesis or dissertation.
- 3.2.7 The Director of Research and Knowledge Transfer conducts an initial inquiry to determine whether there is a credible basis for the allegation. This person 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 or that of the complainant. A person who takes part in the examination process must have no conflict of interest, be it real, potential or perceived.
- 3.2.8 The Director of Research and Knowledge Transfer 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 3.3.1.
- 3.2.9 If the allegation is rejected after being deemed to be manifestly unfounded, the complainant will be notified in writing within twenty (20) days of submission of the allegation. The

Director of Research and Knowledge Transfer will make every effort to protect or restore the reputation of the individuals wrongly subjected to the allegation.

3.2.10 Anonymous allegations will be addressed in accordance with the procedures described in this section, while making the necessary adjustments. The Director of Research and Knowledge Transfer will examine an anonymous allegation if it is supported with sufficient information to evaluate the allegation and the underlying facts and proof without need for further information from the complainant.

3.3 Investigating Allegations

3.3.1 If the allegation is determined to be responsible, the Director of Research and Knowledge Transfer will convene an investigation committee to handle the complaint.

3.3.2 In the case of an allegation related to activities with a tangible funding link only to the Fonds de recherche du Québec ("FRQ"), the Director of Research and Knowledge Transfer 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 and Knowledge Transfer will then deal with the complaint pursuant to Section 3.3, with the necessary adjustments. If a mistake was made in good faith, the Director of Research and Knowledge Transfer can reject a complaint related to activities with a tangible funding link only to the FRQ.

3.3.3 The investigation committee is appointed by the Director of HEC Montréal, who will also designate its chairperson. This committee will be composed of two full professors at HEC Montréal and one external member who is not affiliated with HEC Montréal. In the case of a complaint against an FRQ-funded researcher, one of the HEC Montréal full professors must be in the same field of research or have the same professional expertise as the person who is the subject of the complaint.

3.3.4 The Director of Research and Knowledge Transfer will 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.

- 3.3.5 The Director of Research and Knowledge Transfer has thirty (30) days from the date of receipt of the complaint in which to convene an investigation committee. Upon its appointment, the investigation committee will act with diligence.
- 3.3.6 The person who is the subject of the complaint will be given written notice of the substance of the complaint. This person will also be informed of their obligation to withdraw from any federal funding organization evaluation process, as described 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.
- 3.3.7 As part of its mandate, the investigation committee may take any steps necessary to obtain the information required for its investigation. It will keep a register of all documents it receives.
- 3.3.8 The person who is the subject of the complaint will be given the opportunity to be heard both in person and in writing by the investigation committee.
- 3.3.9 In the process of handling allegations, the principles of confidentiality and the presumption of innocence must be respected. The individuals investigating complaints will protect the privacy of both the respondent and the complainant. They must sign a confidentiality agreement to this effect. All documents and information provided to the committee will be confidential.
- 3.3.10 The investigation committee will submit its report to the Director of Research and Knowledge Transfer within sixty (60) days of its completion of the investigation. The report will 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.

3.4 Decisions on misconduct

- 3.4.1 In the event that the investigation committee finds the allegation to be unfounded, the Director of Research and Knowledge Transfer will 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 and Knowledge Transfer will take the necessary steps to safeguard or restore, as the case may be, the reputation of the persons involved.
- 3.4.2 In the event that the investigation committee finds the allegation to be substantiated, the Director of Research and Knowledge Transfer will forward the investigation committee's

report and the 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 will be replaced, if applicable, by “Director of the Academic Programs.”

3.4.3 Before imposing a sanction, the Director of Faculty Affairs must take into consideration the nature and severity of the alleged misconduct. They will also give the person who is the subject of the allegation the opportunity to comment on the sanction.

3.4.4 The main sanctions that can be imposed on an HEC Montréal employee 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:

- sending the person who is the subject of the complaint a letter advising them of HEC Montréal’s concerns
- requesting that the researcher correct the research record and provide proof that the research record has been corrected
- advising the researcher that the Research and Knowledge Transfer Office will not accept applications for future funding from them 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.
- require the removal of items from a promotion file.

Any person affected by a prohibition of requesting or receiving funds from a funding agency must 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 must not participate in such a process while the investigation is ongoing.

The main sanctions that can be imposed on a student of HEC Montréal 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 project, 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.

- 3.4.5 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.
- 3.4.6 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.
- 3.4.7 At the end of the process, the Director of Faculty Affairs will inform the person who is the subject of the allegation of the sanction to be imposed. They may inform the complainant that the investigation has been completed and a finding made but are not required to inform them of the sanction imposed.
- 3.4.8 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 will be composed of three members, mainly HEC Montréal faculty members, appointed by the HEC Montréal Director, who will also designate one of these members to act as chairperson. The application for review must be submitted to the Director of Research and Knowledge Transfer no later than thirty (30) days following receipt of the notice of sanction.
- 3.4.9 The application for review will be analyzed on the basis of the file as it stands. The research integrity appeal committee will present its conclusions and recommendations to the Director of HEC Montréal. Upon receiving the appeal committee's recommendations, the Director of HEC Montréal will render a decision deemed appropriate on the decision made by the investigation committee and on the sanction imposed. The Director HEC Montréal will then inform the person who is the subject of the allegation of the sanction to be imposed. This decision will be final and binding.

4. INFORMATION TO BE PROVIDED TO FEDERAL GRANTING AGENCIES

- 4.1 Subject to any applicable laws, including privacy laws, the Office of Research and Knowledge Transfer must 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 Director of Research and Knowledge Transfer will write a letter to the SRCR confirming whether they are 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 apply.
- 4.3 The Director of Research and Knowledge Transfer prepares a report for the SRCR on each investigation they conduct 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 will include the following information:
- the specific allegation(s), a summary of the finding(s) and reasons for the finding(s)
 - the process and timelines established for the inquiry and/or investigation
 - the response of the person who is the subject of the complaint to the allegation, investigation and findings, and any measures taken to rectify the breach
 - the HEC Montréal investigation committee's decisions and recommendations and the actions taken by the institution.
- 4.4 The Director of Research and Knowledge Transfer's report should not include:
- information that is not related specifically to agency funding and policies

- personal information about the person who is the subject of the complaint, 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 must be submitted to the SRCR within two months, respectively of receipt of the allegation by HEC Montréal. If an investigation is warranted, HEC Montréal has five months after the inquiry ends to conduct the investigation and present its report to the SRCR. HEC Montréal, therefore, has a total of seven months to report to the SRCR upon receipt of an allegation that leads to an investigation. These timeframes may be extended in consultation with the SRCR if circumstances warrant. The SRCR must receive monthly updates until the investigation is complete. The SRCR and HEC Montréal will determine jointly how often periodic updates must be provided.
- 4.6 HEC Montréal and the person who is the subject of the complaint must not enter into confidentiality agreements or other agreements related to an inquiry or investigation that would prevent HEC Montréal 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 HEC Montréal.

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 FRQ, the Office of Research and Knowledge Transfer will be obliged to inform the FRQ of this at certain stages of the process.
- 5.2 The Director of Research and Knowledge Transfer must inform the FRQ immediately if urgent action on the part of HEC Montréal becomes necessary. The Fonds involved will communicate with HEC Montréal to evaluate if immediate action by the FRQ is also appropriate. It will then be necessary to provide the FRQ with the identity of the person against whom the allegation was filed.

- 5.3 The Director of Research and Knowledge Transfer must 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 must not include personal data about the persons involved in the allegation. The letter will 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 Director of Research and Knowledge Transfer will 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 HEC Montréal's 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 must be informed without delay. The Director of Research and Knowledge Transfer must send a full copy of the committee report to the director of the FRQ's Legal and Ethics Office and inform the person who is the subject of the complaint that the information has been sent to the FRQ. The identity of the persons involved will then be made known to the FRQ. The complete and unabridged report will 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 set out in HEC Montréal's 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, based on the HEC Montréal 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 and Knowledge Transfer decides not to strike an investigation committee under Article 3.2.2., the Director will inform the FRQ in the manner indicated in Section 5.5, with the necessary adjustments.

6. PRESERVATION OF DOCUMENTS

- 6.1 The Director of Research and Knowledge Transfer oversees the preservation of documentation relating to the execution of this policy until it is archived.

7. TRANSPARENCY AND ACCOUNTABILITY

- 7.1 Each year, HEC Montréal must post on its website information on confirmed breaches of its policy (e.g., the number of breaches and their general nature), subject to applicable laws including privacy laws.
- 7.2 Each year, HEC Montréal must report to the SRCR the total number of allegations received regarding agency funding, the number of confirmed breaches and their nature, subject to applicable laws including privacy laws.

8. POLICY APPLICATION AND MANAGEMENT

- 8.1 HEC Montréal's Research and Knowledge Transfer Office is responsible for the application of this policy and its mandate is to:

- ensure the policy is applied and followed, and take any necessary measures to this end
- determine the conditions and procedures for the rules set out in this policy
- assume any other responsibilities in connection with this mandate that the Director of HEC Montréal may entrust to it, including the submission of a report on the application of this policy, or, the revision of its contents.

9. EFFECTIVE DATE AND REVIEW

- 9.1 This policy comes into effect on the date of its adoption by the Academic Council, on April 25, 2012.
- 9.2 Its most recent update was adopted by the Academic Council on May 25, 2022.
- 9.3 It must be revised when Federal and Quebec funding agencies update their policy on the responsible conduct of research.