



POLICY: Integrity in Research and Scholarship		POLICY NUMBER: R-4
		PREVIOUS/REPLACES: Integrity in Research and Scholarship
APPROVED BY: Executive Council	EFFECTIVE DATE AS OF: May 4, 2021	PRIOR VERSIONS: December 5, 2018

1. Policy Statement:

Purpose:

To establish the expectations and standards of the Manitoba Institute of Trades and Technology (to be referred to as MITT or Institute) regarding integrity in the conduct of research and scholarly activities, the investigation of alleged misconduct, and the promotion of the responsible conduct of research to ensure awareness by MITT employees, students and clients participating in research and scholarly activities.

Statement:

This policy has been crafted for two reasons:

- To ensure that all research conducted at or by MITT is of the highest quality and integrity, and
- To meet the expectations of grantors as outlined in the federal “Tri-Agency Framework: Responsible Conduct of Research”¹. At MITT all research and scholarly activities will be conducted with the utmost integrity and to the highest ethical standards. Broadly, truth and honesty will be displayed in the collection, analysis and reporting of data; appropriate acknowledgement will be given to contributors, sources of concepts and results, and supporters and funders; and resources and funds will be utilized as agreed to.

This expectation has been set to protect the reputation of the Institute, to provide a common standard of performance for all research conducted at or through the Institute, and to produce graduates with a solid understanding of ethical behaviour and standards.

Although aspects of this policy may seem to be more appropriate to the world of academic research and publications, the concepts and standards are very applicable to work done with clients in that the Institute has a duty to ensure that data, findings and reports presented to clients are accurate and contain verifiable data and reports that appropriately acknowledge the impact of previous work, the contributions of those who conducted the research and the support of those providing funds and resources.

¹ Published by the Tri-Agency Panel on Responsible Conduct of Research <https://rcr.ethics.gc.ca/eng/framework-cadre-2021.html> and administered by the Secretariat on Responsible Conduct of Research.



Principles:

- 1.1 The Vice-President, Academic shall be the steward of and point of contact for this policy. Communications regarding this policy shall be addressed to the Vice-President, Academic.
- 1.2 Responsibilities of Researchers
 - 1.2.1 All MITT employees and students who engage in research and scholarly activities shall conduct themselves and their research with the utmost integrity and to the highest ethical standards in the execution of these activities, including meeting all applicable laws, regulations, grantor policies, contractual obligations and Institute policies and procedures.
 - 1.2.2 Any research conducted at MITT shall meet the following integrity standards:
 - 1.2.2.1 *Rigour* - all activities shall be conducted with scholarly and scientific rigour including proposing and performing research; collecting, recording, collating, analyzing, and interpreting data; using data only for the purpose for which it was collected; and reporting of results, data and findings to clients or through publication.
 - 1.2.2.2 *Record Keeping* – complete and accurate records must be kept of data, methodologies, findings, graphs and images that would allow verification or replication of the results by others and free access to original data by all contributors and authors. Data must be retained and stored in accordance with applicable laws, policies, agreements and best practices.
 - 1.2.2.3 *Accurate Referencing* – ensuring proper references are given and, as applicable, permissions are obtained, for the use of published or unpublished data, source material, theories, concepts, methodologies, findings, graphs and images.
 - 1.2.2.4 *Authorship* – reports, publications or presentations must include as authors, with their consent, all who made a substantial contribution, whether conceptual or material, to and accept responsibility for, the material contained in the document or presentation.
 - 1.2.2.5 *Acknowledgement* – ensuring all those and only those who contributed to the research, including sponsors and grantors, are acknowledged for their contributions.
 - 1.2.2.6 *Conflict of Interest Management* – ensuring that all real, potential or perceived conflicts of interest are addressed in accordance with MITT’s “Conflict of Interest” policy.
 - 1.2.3 Any research conducted that uses human subjects shall be conducted in accordance with MITT’s “Ethical Conduct for Research Involving Human Subjects” policy.
 - 1.2.4 Any resources, including grants, used for research and scholarly activities shall be used for the purposes for which they were provided, in accordance with MITT’s “Administration of Research” policy.
 - 1.2.5 The intellectual property rights of MITT and its clients shall be respected and protected in accordance with MITT’s “Intellectual Property” policy.
 - 1.2.6 Any copyrighted material used or referenced in any research will be utilized in accordance with MITT’s “Copyright/Fair Dealing” policy.



- 1.2.7 Research supervisors and Instructors supervising student curricular-based applied research projects have a duty to inform research staff and students of their responsibilities as researchers and monitor their work to ensure it conforms to the standards set in paragraphs 1.2.2.1 to 1.2.2.6.
- 1.3 Exclusions
- 1.3.1 MITT does not conduct research or deliver education that involves biohazardous or radioactive materials and thus has no policy related to these materials. If these are used in the future, the Institute will create applicable policies that meet recognized standards.
- 1.3.2 MITT does not use animals in research or education and thus does not have a policy on “Animal Care and Research”. If animals are used in the future, the Institute will create applicable policies that meet recognized standards.
- 1.4 Misconduct at MITT
- 1.4.1 Misconduct at MITT is considered to have occurred if any of the following alleged breaches of the Responsibilities of Researchers (paragraph 1.2) have been substantiated. Specifically,
- 1.4.1.1 *Fabrication* – violating the principle of *rigour* by making up data, source material, methodologies or findings, including graphs and images.
- 1.4.1.2 *Falsification* – violating the principle of *rigour* by changing, omitting or manipulating data, source material, methodologies or findings, including graphs and images.
- 1.4.1.3 *Destruction of Research Records* – violating the principle of *record keeping* by destroying one’s own or another’s research data and records in order to avoid the detection of misconduct or wrongdoing, or in violation of relevant funding agreements, institutional policies, laws, regulations and professional or disciplinary standards.
- 1.4.1.4 *Plagiarism* – violating the principle of *accurate referencing* by using the published or unpublished work of others, including theories, concepts, data, source material, methodologies or findings, including graphs or images, and presenting them as one’s own without appropriate referencing or permission, if required.
- 1.4.1.5 *Redundant publication or self-plagiarism* – violating the principle of *accurate referencing* by having one’s previously published work or a part of it, including data, re-published in any language without adequate acknowledgement of the source or justification for the re-publication.
- 1.4.1.6 *Invalid Authorship* – violating the principle of *authorship* by ascribing authorship inaccurately, such as attributing authorship to persons who have not made substantial contributions to nor accept responsibility for the contents of a publication, report or presentation.
- 1.4.1.7 *Inadequate Acknowledgement* – violating the principle of *acknowledgement* by failing to recognize contributors appropriately.



1.4.1.8 *Mismanagement of Conflict of Interest* – violating the principle of *conflict of interest management* by not identifying and addressing any real, potential or perceived conflict of interest in accordance with the MITT “Conflict of Interest” policy.

1.5 In addition, MITT considers misconduct to have occurred if there is:

1.5.1 Misrepresentation in a grant proposal for funding, research report or other research related document, including,

1.5.1.1 Providing incomplete, inaccurate or false information including in letters of support or listing co-applicants, contributors or partners without their consent.

1.5.1.2 Applying for or holding an award while deemed ineligible to do so due to a breach of responsible conduct of research policies anywhere in the world.

1.5.2 Mismanagement of grant, institutional or client funds in accordance with Grantor, Institute or client policies, agreements or contracts, including not reporting a significant change in research activities or use of research funds.

1.5.3 A breach of Grantor, Institute or Client policies for certain types of research, such as Principle 1.2.3 on research involving human research, or failure to obtain appropriate approvals, permits or certifications prior to commencing the research.

1.5.4 A breach of a Grantor or Institute review process such as non-compliance with Conflict of Interest or Confidentiality policies, or participating in reviews when under investigation for allegations of misconduct.

1.5.5 Use of resources, equipment or facilities in a way that deviates from approved research practices or standards of use.

1.6 Addressing Allegations of Misconduct

1.6.1 All cases of alleged breach of policies related to research, whether deliberate or inadvertent, must be reported to the Institute’s point of contact in writing. An inquiry will be conducted to determine if an allegation is responsible² and an investigation is warranted. If the alleged breach is considered a wrongdoing as defined in MITT’s Whistleblower Policy, it will be addressed through MITT’s Public Interest Disclosure Policy.

1.6.2 Allegations of misconduct are generally to be submitted with the complainant identified to enable the Institute to seek clarification and feedback during any inquiry or investigation.

1.6.2.1 Anonymous allegations of misconduct will be considered if sufficient factual information is provided to enable the assessment of the allegation and the credibility of the evidence to occur without the need for further information from the complainant.

² A “responsible allegation” is composed of three elements. One, the allegation must be based on facts, not just hearsay. Two, it must be novel, that is, not have been previously investigated to the complainant’s knowledge. Three, it must encompass one or more of the breaches described in this Policy.



- 1.6.2.2 To the extent possible, MITT will protect from reprisals any persons making an allegation in good faith or supplying information related to an allegation, in accordance with relevant legislation and MITT’s “Public Interest Disclosure (Whistleblower)” policy.
- 1.6.3 Respondents have the right to know the allegations against them.
- 1.6.4 MITT shall ensure that the complainant and respondent are given the opportunity to be heard, that is to present data, information or comments that are pertinent to the investigation, and that these will become part of the record of the inquiry or investigation.
- 1.6.5 The Institute has established the Vice-President, Academic (VPA) as the central point of contact to receive any confidential enquiries, allegations of breach of policies, and information related to allegations.
- 1.6.6 The Institute shall investigate all responsible allegations of misconduct and, if applicable, report to grantors and clients as required by their policies.
 - 1.6.6.1 In exceptional circumstances, on receipt of an allegation MITT may independently or at the request of a grantor or client, take immediate action to protect the administration of research funds and resources including freezing research accounts or requiring a second authorized signature on all transactions.
 - 1.6.6.2 In the event that an allegation is received that pertains to misconduct that happened at another institution (where the respondent was an employee, student or in another capacity) and not in the course of employment, volunteering or studying at MITT, MITT will contact the point of contact at the other institution to determine which institution should conduct the inquiry and investigation. MITT will inform the complainant of which institution will be the point of contact for the allegation.
- 1.6.7 MITT will establish a Responsible Conduct of Research Review Committee for each investigation and grant it the authority to determine in a fair and impartial manner if misconduct has occurred. The committee shall be composed of three independent members with the necessary expertise and with no real, potential or perceived conflict of interest, one of whom shall be external, with no current affiliation with the Institute.
- 1.6.8 Those involved in allegations of misconduct as complainants, respondents or third parties are expected to provide information related to the allegation in good faith and in confidence, and to submit such information directly to MITT’s designated point of contact. They are expected to comply with all Institute policies, processes and procedures related to their role in the addressing the allegation.
- 1.6.9 Sanctions and measures to remediate actual misconduct will be taken in accordance with Institute and grantor policies and procedures.
- 1.6.10 The Institute shall ensure that the respondent has an opportunity to appeal if a breach of policy is verified. Appeals can be addressed to the point of contact.



- 1.6.11 If the investigation concludes that no misconduct occurred, MITT will make every effort to protect or restore the reputation of the respondent and others wrongly accused of misconduct and may subject the complainant to sanctions if the allegation of misconduct is determined to be unfounded, malicious, reckless or made in bad faith.
- 1.7 MITT shall report all cases of allegations of misconduct, subject to any applicable laws, including privacy, to grantors and clients.
 - 1.7.1 Allegations involving research supported by Tri-Agency or other grantor funds will be reported to the *Secretariat on Responsible Conduct of Research* or the point of contact for other grantors respectively
 - 1.7.1.1 If the allegation may involve significant financial, health and safety, or other risks, MITT shall immediately inform the relevant grantor or client, as appropriate.
 - 1.7.1.2 Where a grantor or client has been copied on an allegation, MITT will send a letter confirming whether or not the Institute will conduct an investigation.
 - 1.7.2 Reports shall include the specific allegation(s); a summary of and reasons for the findings; the process and timelines followed for the inquiry or investigation; the researcher's response to the allegation, investigation and findings and measures the researcher has taken to rectify the breach; the decisions and recommendations of the investigating committee; and the actions taken by MITT.
 - 1.7.3 Reports of findings of an inquiry or investigation shall be made to both complainant and respondent(s).
 - 1.7.4 Where the allegation of breach is confirmed, MITT shall inform the respondent of any actions to taken to remediate the breach and any sanctions to imposed on the respondent.
 - 1.7.5 The reports should not include any information specifically related to the grantor's or client's funding or policies, or any personal information about any person that is immaterial to the findings of the Institute and the report.
 - 1.7.6 Inquiry letters and reports should be submitted within two months. If an investigation is warranted, MITT will submit a report within five months of the end of the inquiry. In exceptional circumstances, the Institute may consult with grantors or clients on extending the timeline and, if granted, provide periodic updates as negotiated until the investigation is finished.
 - 1.7.7 The point of contact for the Institute shall retain a complete report for each allegation.
- 1.8 MITT will not enter into any confidentiality or other agreements with respondents that would prevent the Institute from reporting to grantors or clients.
- 1.9 MITT will provide information and reports to grantors, as requested, if the source of funding is unclear.



1.10 Promoting the Responsible Conduct of Research

- 1.10.1 MITT will provide training to all employees and students involved in research and scholarly activities on their responsibilities to conduct research with integrity and to the highest ethical standards as described in this Policy. This training will include information on the consequences of failing to meet this Policy and the process for addressing allegations.
- 1.10.2 MITT will communicate this Policy within the Institute.
- 1.10.3 Subject to applicable laws, including privacy, MITT will post confirmed findings of breaches of the responsible conduct of research on its website, including the number of breaches and the general nature of such breaches.
- 1.10.4 Subject to applicable laws, including privacy, MITT will report annually to the *Secretariat on Responsible Conduct of Research* the total number of allegations received involving Tri-Agency funds, the number and nature of confirmed breaches.
- 1.10.5 MITT will communicate within the Institute and on its website the central point of contact for receiving confidential enquiries, allegations and information related allegations of breach of Institute, grantor and client policies.

2. Scope:

This policy applies to all employees, students and clients of MITT and anyone associated with the Institute in the conduct or administration of research or scholarly activities.

3. Procedure:

To be determined after the policy has been endorsed.

4. Administration:

The Vice-President Academic is responsible for ensuring that this policy is adhered to.

5. Review:

This policy will be reviewed every five years by Executive Council.

6. Reference:

Research

1. Administration of Research
2. Ethical Conduct for Research Involving Human Subjects
3. Intellectual Property
4. Research and Innovation



General

1. Academic Integrity – MITT Staff, Instructors and Students
2. Code of Conduct and Staff Ethics
3. Conflict of Interest
4. Copyright/Fair Dealing
5. MITT Expectations of Staff
6. Privacy and Access to Information
7. Privacy Guidelines
8. Public Interest Disclosure (Whistleblower)
9. Student and MITT Expectations Policy
10. Student Behaviour Policy
11. Student Discipline Policy
12. Use of MITT Equipment

Supporting Information

1. Panel on Responsible Conduct of Research <https://rcr.ethics.gc.ca/eng/home.html>

7. Definitions:

See Applied Research Policy Definitions (R-6)