



# Sharing Information on the Responsible Conduct of Research: A Canadian Perspective

Fekken, G. C. Queen's University

Klymenko, A. Lakehead University

Martyn, G. University of British Columbia

Moody-Corbett, P. Northern Ontario School of Medicine

Paquet, C. University of Ottawa

Roposa, K. University Health Network, Toronto

Wallace, K. Canadian Secretariat on Responsible Conduct of Research

# Background

- Administrators who manage RCR processes are expected to maintain confidentiality
- Multiple privacy policies and regulations govern confidentiality in complex ways in Canada
- Sharing across international borders even more complex
- Some confidential information about RCR matters must be shared.....



# Risks of Inadequate Information Sharing

- For institutions
  - Incomplete assessment of unidentified related breaches
  - Potential for inefficiency due to duplicate reviews
  - Financial risk for not identifying breaches to grant funding
  - Incomplete corrective and preventive actions
  - Inconsistent sanctions/ remedial actions
  - Inappropriate disclosure results in legal risk, contract violations and breach of privacy legislations
- For individuals
  - Damaged reputation
  - Violation of legal or contractual rights
  - Unfair or unhelpful corrective requirements
- For science and scholarship
  - Inaccurate scientific record



# Survey Objective



- To summarize how Canadian institutions share information about responsible conduct of research (RCR) matters
  - to extract best practices for the Canadian research community
  - to identify gaps in best practices for information sharing
  - to contribute to the international discussion on sharing information related to the responsible conduct of research



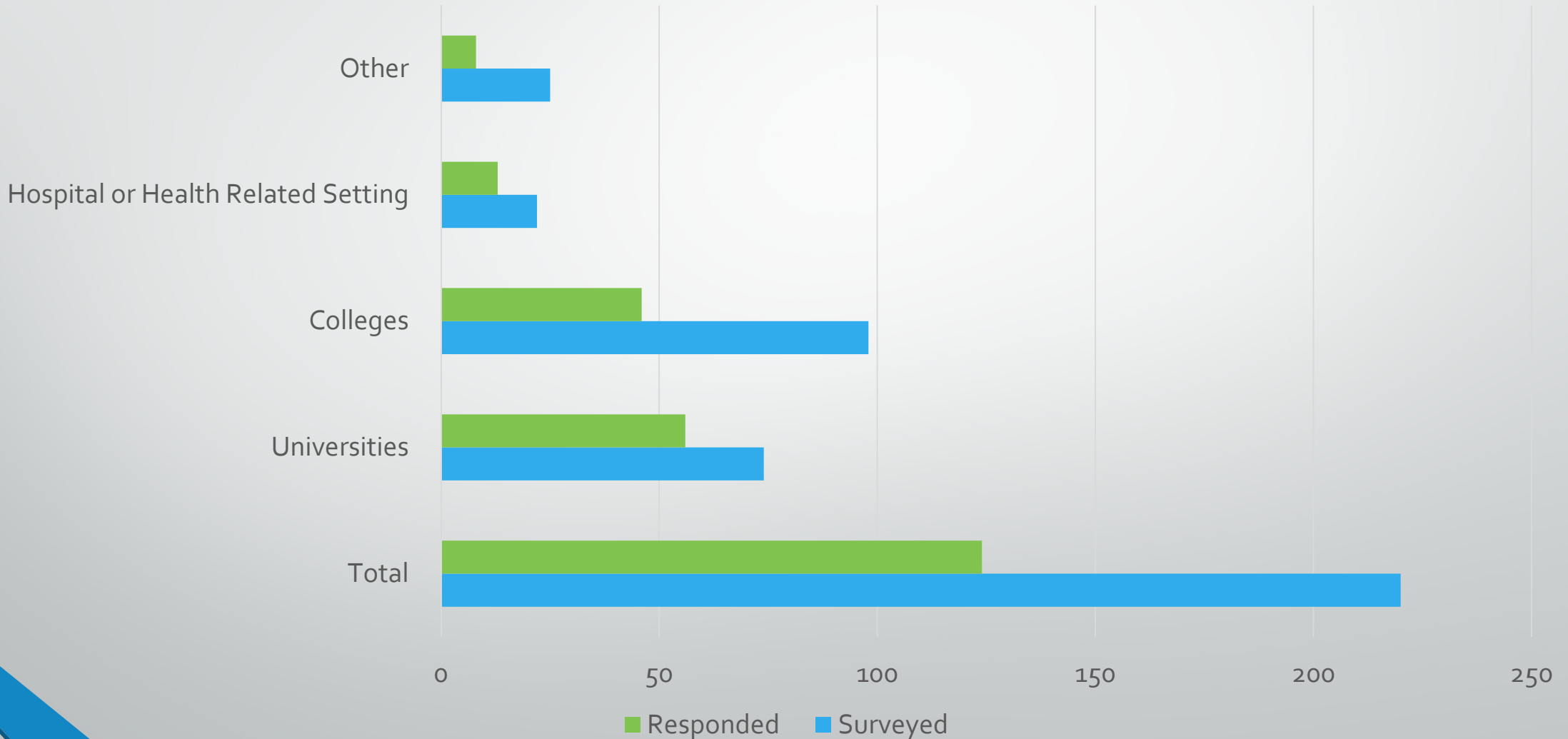
# Method



- **Survey:** 26 question, on line survey conducted in Fall 2018
- **Survey Focus:** Content of policies at Canadian institutions related to sharing information about allegations and findings regarding the responsible conduct of research
- **Survey Respondents:** Person with primary responsibility for administering the institution's RCR policy
- **Survey designers:**
  - 7 professionals who work on responsible conduct of research at their institutions
  - Group convened by the Canadian Secretariat on Responsible Conduct of Research

# Institutional Representation

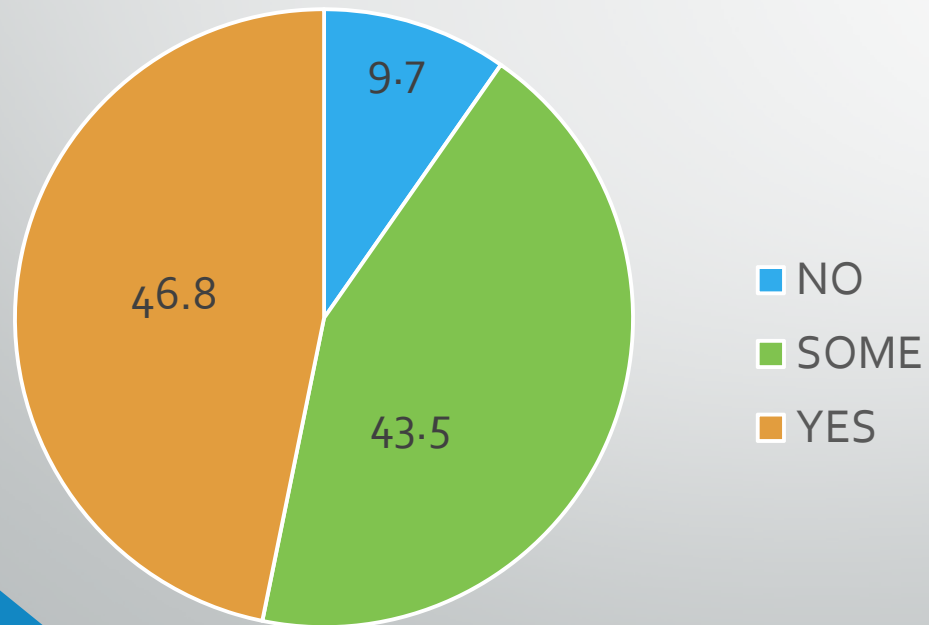
80% of survey respondents stated they were the usual contact person for RCR



# How Institutions Govern Confidentiality

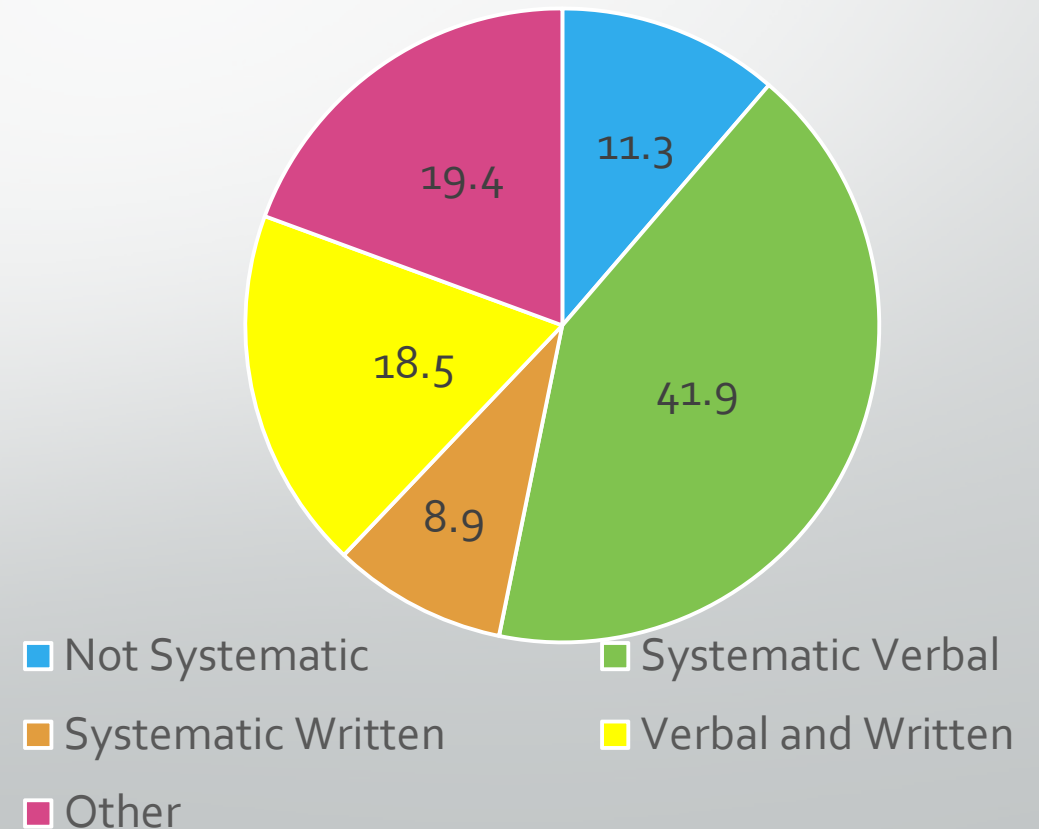
Are there formal guidelines for managing confidentiality of RCR matters?

Percentages



How does your institution manage confidentiality of process and procedures related to RCR matters?

Percentages



# Who Sees the Allegations?



- **61%** : Senior Administrator is the contact person
- **72%** : 1 or 2 other senior administrators also must see the allegation but....  
**28%** of policies designate 3 to 7 others
- **51%** : some or complete discretion allowed as to who else knows
- **Practice** is that senior administrators, lawyers or unit heads are informed
  - **83%** : inform at least another 5 people in writing of the allegation .... another 17% inform up to 9 people in writing



# When Must the Respondent be Informed of the Allegation?



- **49%** : 0 to 10 days
- **23%** : 10 to 30 days
- **3%** : more than 30 days
- **24%** : no time frame specified



# Who Sees the Findings of the Initial Inquiry?

- **48%** : some or complete discretion allowed when the initial inquiry showed **NO** breach occurred
- **46%** : some or complete discretion allowed when the initial inquiry showed **YES** breach occurred
- **Practice** : **89%** inform at least **6** people in writing of the result of the inquiry and .... another **11%** inform up to **10** people in writing
  - Generally inform senior administrators, lawyers or unit heads
  - 50% also mention external bodies, such as funding agencies and journals



# Who Sees the Findings of an Investigation?

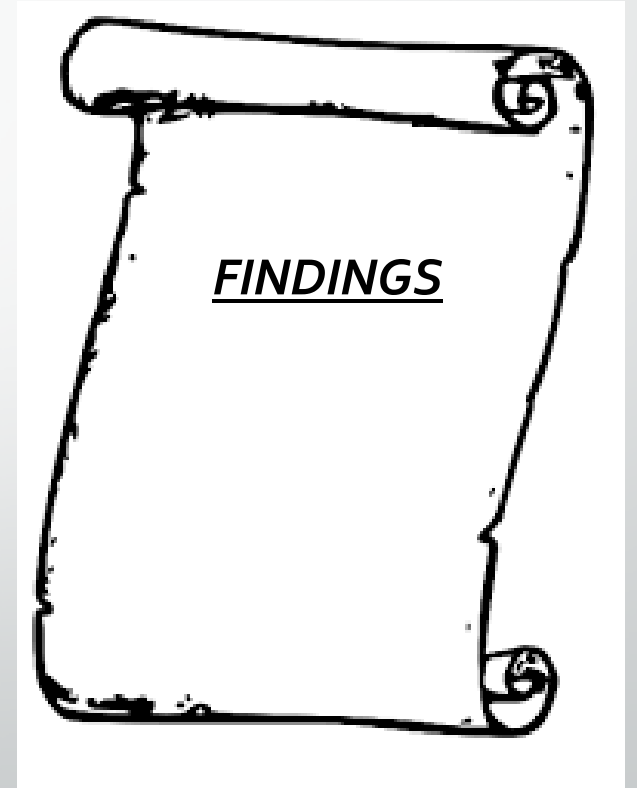


- **52%** : some or complete discretion allowed as to who knows irrespective of whether **NO** breach or **YES** breach is found
- **Practice** : About 4 people; especially, senior administrators, unit heads, external bodies are told when **NO** breach has occurred
- **Practice** : About 5 people; especially, senior administrators, unit heads, external bodies are told when **YES** breach has occurred

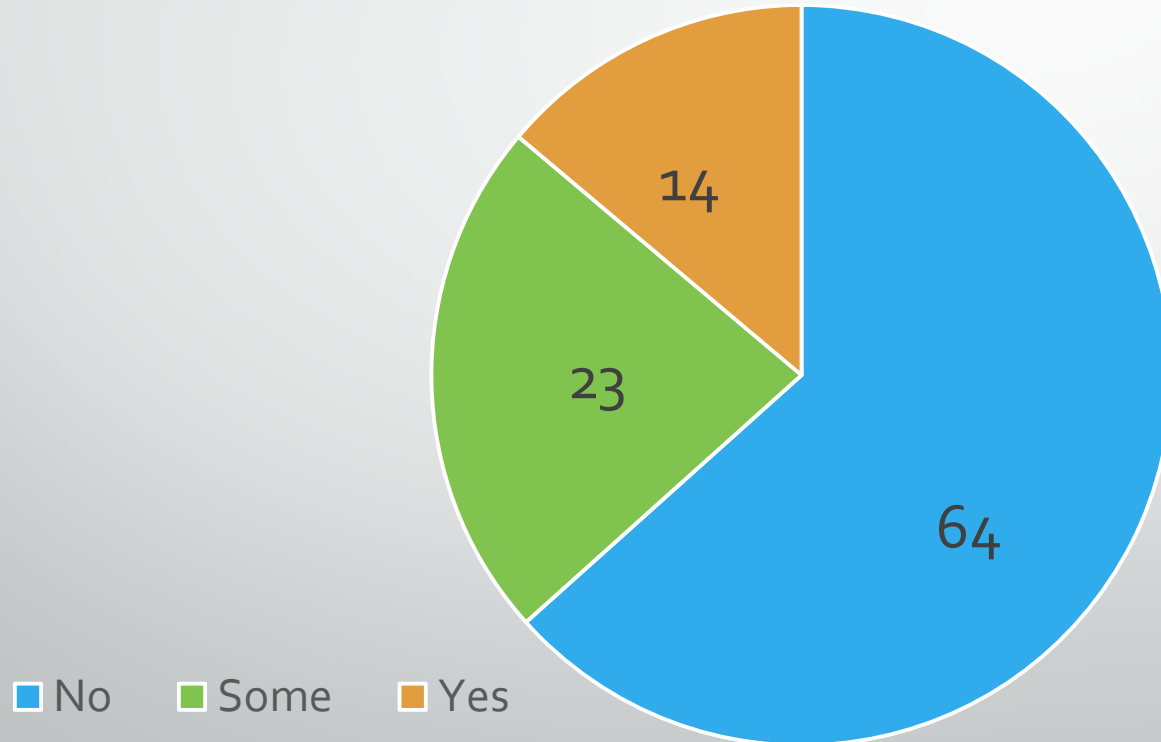
# What Percentage of Policies Require Findings to be Provided to Respondents and Complainants in Writing?



- Respondents
  - **66%** Findings of the Initial inquiry
  - **57%** Findings of the Investigation
- Complainants
  - **58%** Findings of the Initial Inquiry
  - **40%** Findings of the Investigation



Are there policy guidelines for sharing information with another institution when the allegation concerns a co-authored paper, shared grant, etc.?



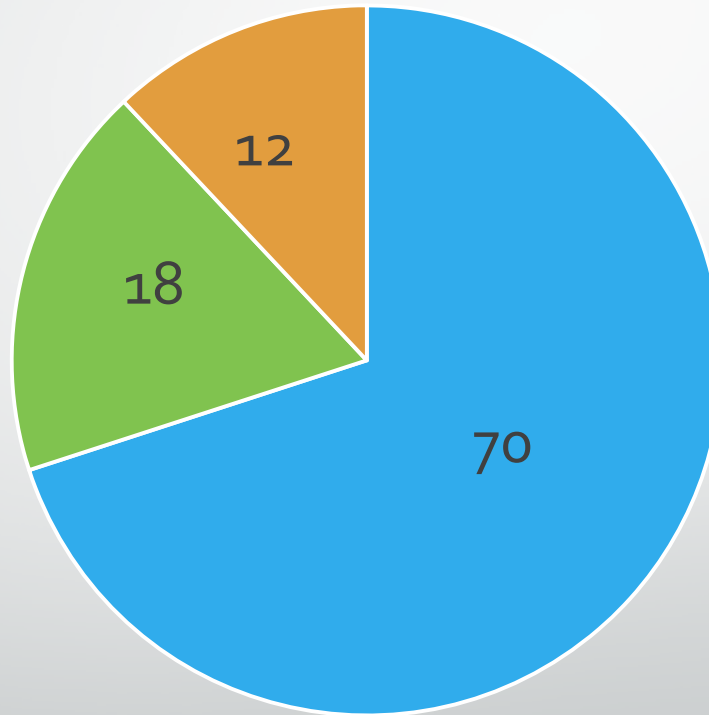
# Information Sharing Practices Across Institutions

- Only 25% of respondents had encountered this situation (i.e. 31 institutions)
  - 71% : Shared allegations
  - 58% : Shared process and findings
  - 3% : Other information (e.g., sanctions)
- Who decided what was shared varied greatly
  - 55% of institutions consulted 2 or 3 people
- 77% : Information was shared verbally and in writing



# Does your Institution have Policy Guidelines about Interacting with the Media about RCR Matters?

## Percentages



■ No Guidelines

■ Generic Guidelines

■ Comprehensive Guidelines





- Most Canadian institutions have formal guidelines and systematic procedures for sharing information on RCR matters
  - However, many policies allow considerable discretion about who is informed and it appears that 6 to 10 people know about even unexamined allegations
  - Whether everyone who is informed about an allegation eventually is informed about the findings is unclear from our survey
  - Information sharing outside of the institution (i.e., with other institutions or with the media) is not systematically addressed in most policies
- Timelines and requirement to have written interactions with respondents and complainants vary across institutions



# Gaps in Current Policies



- All institutions should have a systematic approach to information sharing
- Local requirements related to other collective agreement or employment law may need to be considered
- Institutions should have clear statements about sharing information related to RCR matters within and outside
  - Respondent must be informed (whether in writing or verbal may depend)
  - Whether complainants are informed may depend on whether they are directly affected
  - Other institutions may need to be engaged and shared processes may be needed, which requires processes and will be especially complex across countries
  - Journals need to be contacted to correct the research record
  - Media responses are part of a more complex set of institutions and legal considerations



# Limitations and Future Directions

- Institutional Staff often have access to information on RCR matters and our survey did not ask about Staff
- Our survey did not ask about real or potential conflicts that exist in the multiple policies, laws and employment documents that pertain to handling complex RCR matters