

RESEARCH INTEGRITY PROCEDURE

Approving Authority: Academic Coordinating Committee

Policy Owner: Vice President, Research

Policy Lead: Research Data & Policy Analyst

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PROCEDURE STATEMENT

This procedure describes the process for submitting and handling allegations of research misconduct and breaches of the Research Integrity Policy occurring during research approved by Conestoga College Institute of Technology and Advanced Learning (Conestoga).

DEFINITIONS

Conestoga Employee: Any employee of Conestoga, whether employed full-time, part-time, or on a contract basis, includes, but is not limited to, faculty, student researchers when compensated as employees, research staff, support staff and administrators.

Conestoga Resources: Any funds administered by Conestoga, including funds for employee compensation, materials, or facilities.

Conflicts of Interest: Activities or situations create a real, potential, or perceived conflict between an individual's research duties or responsibilities and personal, institutional, or other interests. These interests include, but are not limited to, business, commercial or financial interests pertaining to the individual, their family members, friends, or their former, current or prospective professional associates.

Partner: Any third-party organization (including, but not limited to, a corporation, another academic institution, a research institution, a hospital or a government agency) that seeks to or does engage in a research or creative activity with Conestoga.

Research: An undertaking intended to extend knowledge through a disciplined inquiry or systematic investigation.

Research Misconduct: Unethical behaviour in the process of conducting research. Research misconduct may include, but is not limited to, one or more of the following breaches of Responsible Conduct of Research as set out directly in the [Tri-Agency Framework: Responsible Conduct of Research \(2021\)](#):

- Fabrication: Making up data, source material, methodologies or findings, including graphs and images.

- Falsification: Manipulating, changing, or omitting data, source material, methodologies or findings, including graphs and images, without acknowledgement, such that the research is not accurately represented in the research record.
- Destruction of research records: The destruction of one's or another's research data or records contravening the applicable funding agreement, institutional policy or laws, regulations and professional or disciplinary standards. This also includes the destruction of data or records to avoid the detection of wrongdoing.
- Plagiarism: Presenting and using another'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, if required, without permission.
- 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 justification.
- 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 for which one made little or no material contribution.
- Inadequate acknowledgement: Failure to appropriately recognize the contributions of others in a manner consistent with their respective contributions and authorship policies of relevant publications.
- Mismanagement of Conflict of Interest: Failure to appropriately manage any real, potential or perceived conflict of interest, in accordance with the institution's policy on conflict of interest in research, preventing one or more of the objectives of the Tri-Agency Framework: Responsible Conduct of Research (2021) from being met.
- Misrepresentation is defined as, but not limited to:
 - Providing incomplete, inaccurate or false information in a grant or award application or related document, such as a letter of support or a progress report;
 - Applying for or holding funding awards when deemed ineligible by any research or research funding organization worldwide for breaches of research policies concerning ethics, integrity or financial management;
 - Listing of co-applicants, collaborators or partners without their agreement.
- Mismanagement of research funds is defined as, but not limited to:
 - Using Agency grant or award funds for purposes inconsistent with the policies of the Agencies; misappropriating grants and award funds; contravening Agency financial policies, namely the [Tri-Agency Guide on Financial Administration \(TAGFA\)](#), Agency grants and awards guides; or

providing incomplete, inaccurate or false information on documentation for expenditures from grant or award accounts;

- Failure to meet Agency policy requirements or to comply with relevant policies, laws or regulations for the conduct of certain types of research activities.
 - Failure to obtain appropriate approvals, permits or certifications before conducting these activities.
 - Failure to disclose a financial or personal interest in any transaction chargeable to a research grant or contract.
 - Failure to follow Conestoga financial directives and practices.
 - Failure to inform Conestoga of a substantial change in research activities or use of research funds.
 - Use of research resources, facilities or equipment in a manner that is inconsistent with approved research practices.
- Material failure to comply with relevant federal and provincial statutes or regulations or other agency and Conestoga policies for the protection of researchers, human participants, or the health and safety of the public, or for the welfare of laboratory animals.
 - Material failure to meet other relevant legal requirements related to the conduct of research, or, for grant holders, material failure to comply with regulations of the relevant agency or agencies concerning the conduct of research.
 - The release of confidential information into the public domain without written permission from the associated partner or holder of the confidential information.
 - Lack of rigour: Lack of scholarly and scientific rigour in proposing and performing research; in recording, analyzing, and interpreting data; and in reporting and publishing data and findings.

Student: An individual enrolled in a course or courses at Conestoga, including full-time and part-time.

RESPONSIBILITIES

Vice President, Research (VPR)

- The VPR shall serve as the central point of contact and will receive all confidential enquiries, allegations of breaches of policy, and information related to allegations of research misconduct.

Respondent

- Individuals who are the target of an allegation of research misconduct must fully cooperate with Conestoga and any ensuing investigation by the terms of this procedure.

Complainants

- Individuals are expected to report any information pertaining to possible research misconduct to the VPR in good faith and confidentially. This information should be sent directly to the VPR in writing. For any allegations involving research funded by the Tri-Agencies, an exact copy of the allegation will be forwarded to the Secretariat for Responsible Conduct of Research (SRCR) (secretariat@srcr-scr.gc.ca).
- Individuals involved in an inquiry or investigation must follow the institution's policy and process as a complainant, a respondent or a third party, as appropriate.

Secretariat on Responsible Conduct of Research (SRCR)

- The SRCR shall receive and review notices of allegations and findings of investigations conducted by Conestoga.
- The SRCR will request additional information relevant to an allegation at any time and may take action to protect Tri-Agency funding.

Senior Human Resources Representative (SHRR)

- The SHRR shall serve as a senior representative of Conestoga responsible for determining, in conjunction with the VPR, that an investigation is required based on the findings of an inquiry.
- The SHRR will review the facts of an investigation and determine the correct course of action, including appropriate disciplinary action.

Responsible Conduct in Research Investigative Committee (RCRIC)

- The RCRIC will collect and review all necessary information relating to an allegation that was found to need an investigation. In doing so, the RCRIC will prepare and deliver a report on their findings to the VPR.

PROCEDURE

1. Submitting Allegations

- 1.1. For Complainants internal to Conestoga, all allegations of research misconduct must be submitted to the VPR via the [Breach of Research Integrity form](#).
- 1.2. For external Complainants, all allegations of research misconduct must be submitted via email to the Research Integrity mailbox (ResearchIntegrity@conestogac.on.ca) and must be addressed to the VPR.
- 1.3. Allegations may be made anonymously but may make it more difficult for an inquiry to find conclusive evidence of wrongdoing. Anonymous allegations will only proceed to an inquiry when accompanied by sufficient information to enable the assessment of the allegations and the credibility of the facts and evidence on which the allegations are based, without the need for further information from the complainant.

2. Inquiry

- 2.1. The VPR will respond to allegations with an inquiry to determine whether an allegation is responsible, what policy or policies may have been breached, and whether an investigation is warranted based on the information provided in the allegation.
- 2.2. The VPR will inform the Respondent of the allegation. In cases where the allegations relate to funding offered by the Tri-Agencies, the VPR will provide notice in writing to the SRCR that an allegation has been received and an inquiry initiated.
- 2.3. During an inquiry, the VPR may do any of the following:
 - 2.3.1. Provide the Complainant and Respondent the opportunity to be heard. During any meeting with the Respondent, the Respondent is entitled to be accompanied by a representative of the Respondent's choosing. In the case of bargaining unit members, this includes a representative from the bargaining unit.
 - 2.3.2. As part of the inquiry, request that any appropriate unit of Conestoga review the matter or some aspect of the matter.
 - 2.3.3. Request additional information regarding the allegation.
- 2.4. Following the inquiry process, the VPR will consult with the SHRR. If the inquiry indicates that the complaint is without foundation, the Complainant and the Respondent will be advised in writing that the complaint is dismissed.
- 2.5. The Complainant may choose to make a written request for further investigation to the VPR within ten working days of being informed of the decision to dismiss the complaint. The Complainant must identify the grounds for further investigation by producing new information not reasonably available at the time of the complaint or evidence of a significant procedural error.
- 2.6. If the VPR, in consultation with the SHRR, determines that, because of the findings of the inquiry, the matter requires an investigation, both the Complainant and the Respondent will be advised in writing that the inquiry has closed and the matter is to be referred to an ad hoc RCRIC. The SRCR will also be informed of the investigation if the allegations relate to funding offered by the Tri-Agencies.
- 2.7. In situations where the Complainant or the Respondent are members of a bargaining unit, the applicable Union Local will be informed of the impending investigation and the expected timelines.

3. Investigation

- 3.1. Conestoga will appoint a three-person RCRIC to ascertain whether research misconduct has occurred and, if so, the extent and seriousness of the offences.
- 3.2. The RCRIC must consist of two senior administrative employees and an external representative from an Ontario college or university. All appointees must have the necessary expertise and be free from conflicts of interest as described in section 3.5.

- 3.3. For investigations that may result in disciplinary action for bargaining unit members, one of the two senior administrative employees appointed to the RCRIC must be a member of Human Resources.
- 3.4. The RCRIC may make use of expert resources as required. No member of the department or school involved shall be among the three persons appointed to the RCRIC.
- 3.5. It is the responsibility of each member appointed to the RCRIC to indicate if they have any perceived conflict of interest with the research project or investigation. RCRIC members shall not have had any prior connection with the matter nor have a close professional or personal relationship with the Respondent. The RCRIC shall be appointed within 30 days from the date the allegation is received in writing by the VPR.
- 3.6. The Respondent has the right to know the allegations under investigation and to respond fully. If the Respondent admits the breach, the VPR may choose to forego establishing an RCRIC.
- 3.7. The RCRIC is to determine whether, on a balance of probability, the Respondent committed an act of research misconduct. The RCRIC may conduct any of the following activities in connection with its investigation:
 - 3.7.1. Review any research or other scholarly activity relevant to the allegation, including Conestoga documents, papers or other methods of scholarly communication.
 - 3.7.2. Conduct interviews with the Complainant, Respondent and other individuals as it deems appropriate. All interviews will be documented and included in the RCRIC report. During any meeting with the Respondent, the Respondent is entitled to be accompanied by a representative of the Respondent's choosing.
 - 3.7.3. Seek impartial expert opinions.
 - 3.7.4. Request a special audit of accounts on the sponsored research accounts of the individuals involved.
 - 3.7.5. Request proof of credentials from any relevant individuals.
 - 3.7.6. For any interviews or correspondence conducted with bargaining unit members, those contacted will have the right to be represented by a representative of their choice, including a representative from their Union.

4. Responsible Conduct in Research Investigative Committee Reports and Timelines

- 4.1. The RCRIC shall submit a written report to the VPR after completing their investigation. Investigations shall seek to be completed within 90 days of the date the allegation was received by the VPR in writing.
- 4.2. The VPR will provide the Respondent with a copy of the RCRIC report within five working days of receipt of the report.

- 4.3. The Respondent will have ten business days to submit a written response if they choose to do so. After the ten working days expire, the RCRIC shall decide by majority vote based on the evidence submitted to it whether misconduct has occurred.
- 4.4. The RCRIC shall seek to make their decision within 120 days of the date the allegation was received by the VPR in writing. The decision of the RCRIC is final. Any finding of misconduct in research shall be based only on clear, compelling, written, and documented evidence.
- 4.5. The RCRIC final report must include the following information:
 - 4.5.1. The specific allegation(s).
 - 4.5.2. The process and timelines followed for the investigation.
 - 4.5.3. A summary of the findings with the reasons for the findings.
 - 4.5.4. Any written response(s) from the Respondent regarding the allegations, investigation and findings and any actions taken to rectify the breach.
 - 4.5.5. Actions taken by Conestoga.
 - 4.5.6. The RCRIC decision regarding whether any misconduct was determined to have occurred, its extent and seriousness, and recommendations regarding rectification.
- 4.6. The report submitted by the RCRIC shall not include:
 - 4.6.1. Information that is not explicitly related to Agency funding and policies.
 - 4.6.2. Personal information about the Respondent or any other person that is not material to the RCRIC findings and its report.
- 4.7. In cases where a student was determined to have committed an act of research misconduct, the VPR will, within five working days of receiving the RCRIC report, refer the matter to be adjudicated under the Student Code of Conduct.
- 4.8. In the case of Conestoga employees, the VPR will provide a copy of the report to the SHRR, who will decide what discipline or other action, if any, is appropriate. Normally, such a decision will be made within ten business days of receipt of the RCRIC report.
- 4.9. In cases where either the Respondent or Complainant belong to a bargaining unit, the outcome of the investigation will first be communicated to the Union Local prior to informing the Respondent or Complainant.
- 4.10. If the investigation sustains an allegation of misconduct in research, and if an outside agency funds that research or has been published or submitted for publication, the VPR shall inform the agency or publisher concerned of the outcome of the investigation, and steps will be taken immediately to ensure that research funds are protected from exploitation and misuse.
- 4.11. A summary of the disposition of the RCRIC will be provided to the Complainant, with pertinent facts at Conestoga's discretion, subject to applicable laws, including privacy laws.

4.12. In cases where the funding source is unclear, Conestoga recognizes that the Secretariat for Responsible Conduct of Research reserves the right to request information and reports from Conestoga.

4.13. The Office of Research Services will keep the report and records relating to the investigation for a period of ten years. Access to the report and records will be granted by application to the VPR.

5. Unfounded Allegations

5.1. If an allegation is unfounded, every effort will be made to protect or restore the reputation of those wrongly subjected to an unsubstantiated allegation, including written notification of the decision to all agencies, publishers, or individuals who Conestoga informed of the investigation.

5.2. Conestoga shall, where practicable, take disciplinary action against employees or students who make unfounded allegations of misconduct in research which are reckless, malicious, or not in good faith.

5.3. Whatever the outcome, Conestoga will endeavor to mitigate the consequences of the process for any individuals unintentionally adversely affected by it.

6. Appeal

6.1. The Respondent(s) or the Complainant(s) may appeal the decision of the RCRIC in writing to the SHRR within five working days of the receipt of the RCRIC decision. The appellant must identify the grounds for the appeal by producing new information not reasonably available at the time of the complaint or evidence of a significant procedural error or, in the case of the Complainant(s), ongoing harm to the Complainant(s) or an organization with which the Complainant(s) is/are directly involved.

6.2. The SHRR will review the RCRIC decision and seek additional information or expert advice at their discretion. The SHRR will provide a final and binding decision within ten working days of the written appeal.

6.3. For allegations not related to funding offered by the Tri-Agencies no further action will be required.

7. Response to Secretariat for Responsible Conduct of Research

7.1. Inquiry letters and investigation reports will be submitted to the SRCR within two and seven months, respectively, of receipt of the allegation by Conestoga. These timelines may be extended in consultation with the SRCR if circumstances warrant, and monthly updates may be provided to the Agency until the investigation is complete.

RELEVANT LEGISLATION AND RELATED DOCUMENTS

- Grant Funding Policy
- [Research Policy](#)
- [Research Procedure](#)
- [Tri-Agency Framework: Responsible Conduct of Research \(2021\)](#)

- [Tri-Agency Guide on Financial Administration](#)

REVISION LOG

2025/09/08 Initial release of procedure.