
INTEGRITY IN RESEARCH AND SCHOLARSHIP

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POLICY

Thompson Rivers University (TRU) is a comprehensive university including trades and technology programs along with more traditional academic and professional programs. The University maintains a strong focus on undergraduate research, with graduate programs established in key areas. Within this environment, research and scholarship are actively encouraged and supported. TRU takes a broad view of research, which includes scholarly activity, the production of creative works, and any other endeavour that results in knowledge creation, innovation, and application; that improves pedagogical practice; and that can be disseminated.

This Policy encourages and guides the highest standards of integrity among researchers and scholars at TRU. The Policy complements TRU collective agreements and University policies; and should discipline be required for a breach of the Integrity in Research and Scholarship Policy, existing disciplinary processes as applicable will be followed. This Policy remains consistent with, and thus endorses, the *Tri-Council Policy Statement: Integrity in Research and Scholarship* and the *Tri-Agency Framework: Responsible Conduct of Research*.

TRU supports and encourages the maintenance of the highest standards of conduct in research and scholarship. Toward that end, TRU strives to provide an environment that supports the best research and that fosters researchers' abilities to act honestly, accountably, openly and fairly in the search for, and dissemination of, knowledge.

Primary responsibility for high standards of conduct in research and scholarship rests with the individuals carrying out these activities.

REGULATIONS

All faculty members, staff, students, postdoctoral researchers and all other research personnel associated with TRU are required to adhere to the principles described in these regulations. Misconduct in research and scholarship is an offence which, depending on its severity, is subject to a range of disciplinary measures up to and including dismissal or expulsion.

Other TRU policies with potential relevance include Academic Honesty (Policy ED 5-0), faculty grievance, faculty discipline, academic freedom (see Collective Agreement between TRU and the TRU Faculty Association) and Conflict of Interest (Policy ADM-4-2).

The University will actively promote understanding of research and scholarship integrity issues by means such as dissemination of written materials, and offering workshops and seminars.

1. RESPONSIBILITIES OF RESEARCHERS

All those conducting research and scholarship, or otherwise involved in the research enterprise in any capacity whatsoever at TRU shall adhere to ethical standards including but not limited to the following:

- 1.1 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.
- 1.2 Keeping complete and accurate records of data, methodologies and findings, including graphs and images, in accordance with the applicable funding agreement, institutional policies and/or laws, regulations, and professional or disciplinary standards in a manner that will allow verification or replication of the work by others.
- 1.3 Referencing and, where applicable, obtaining permission for the use of all published and unpublished work, including data, source material, methodologies, findings, graphs and images.
- 1.4 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 authorship policies of relevant publications.
- 1.5 Deciding on questions of authorship early in the production of the work.
- 1.6 Acknowledging, in addition to authors, all contributors and contributions to research, including writers, funders and sponsors.
- 1.7 Appropriately managing any real, potential or perceived conflict of interest, in accordance with TRU's policy on Conflict of Interest, in order to ensure that the objectives of the Tri-Council Framework (Section 1.3) are met. All members of the research community will follow fundamental principles of integrity, including honesty, competence, trust, fairness, respect for

others, responsible stewardship of resources, and responsibility in all aspects of academic scholarship.

Researchers must comply with all applicable laws, rules and university requirements for the conduct of research, including, but not limited to the

Tri-Agency Framework: Responsible Conduct of Research (Framework)

2nd edition of Tri-Council Policy Statement: Ethical Conduct of Research Involving Humans (TCPS 2); Canadian Council on Animal Care Policies and Guidelines;

Tri-Agency policies related to the Canadian Environmental Assessment Act, 2012;

Licenses for research in the field;

Laboratory Biosafety Guidelines;

Canadian Food Inspection Agency Containment Standards for Veterinary Facilities;

Controlled Goods Program;

Canadian Nuclear Safety Commission (CNSC) Regulations; and

Canada's Food and Drugs Act.

2. APPROVALS

Researchers (including students performing research) must seek and obtain approval from:

- 2.1 the Research Ethics Board - Human Subjects (REB-HS) before engaging in research involving human subjects research protocols in the performance of the research. The REB-HS has the authority to suspend and/or terminate research for failure to comply with the ongoing review process or on the basis of information from the review or other sources indicating the research should be halted on ethical grounds. Except in the case of a reversal following formal appeal, the institution may not overturn an REB-HS decision to reject a proposal.
- 2.2 the Animal Care Committee - before engaging in any research involving animals and then comply fully with the approved research protocols in the performance of the research. The committee has the authority to suspend and/or terminate research for failure to comply with the on-going review process or on the basis of information from the review or other sources indicating the research should be halted on ethical grounds. Except in the case of a reversal following formal appeal, the institution may not overturn a Research Ethics Committee - Animal Subjects decision to reject a proposal.
- 2.3 the Occupational Health and Safety Department before engaging in research involving biohazards, and any other potential health or safety hazards and then comply fully with the approved research protocols in the performance of the research.

2.4 the Radiation Safety Officer before engaging in research involving ionizing radiation.

3. CONFLICT OF INTEREST

A conflict of interest may arise when activities or situations place an individual or institution in a real, potential or perceived conflict between the duties or responsibilities related to research, 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. (Based on the Tri-Council Policy Statement: Ethical Conduct of Research Involving Humans, TCPS 2, Chapter 7.)

Researchers and scholars must:

- 3.1 comply with TRU and funding agency rules and policies as it relates to the operational and financial terms of research grants and/or contracts awarded to the researcher;
- 3.2 disclose potential conflicts of interest before any research funds are released and at any point during the research should any conflict of interest arise;
- 3.3 reveal in writing, in a timely manner any material financial interest in a company that contracts with the University to undertake research, particularly research involving the company's products. (Material financial interest includes ownership, substantial stock holding, directorship, significant honoraria or consulting fees, but does not include minor stock holding in a large, publicly traded company); and
- 3.4 reveal in writing, in a timely manner, to sponsors, TRU and other relevant universities/ colleges, journals or funding agencies, any material conflict of interest that might influence their decision on whether the individual should be asked to review manuscripts or applications, test products or be permitted to undertake work sponsored from outside sources.

4. MISCONDUCT*

TRU is responsible for investigating allegations of misconduct involving its researchers and scholars. Such allegations may arise from sources within or outside the University. Whatever their source, motivation or accuracy, allegations of misconduct in research have the potential to cause great harm to the person accused, to the person making the accusation, to the University, and to research and scholarship in general. They, therefore, require prompt, effective action by the University.

Acts of scholarly misconduct may be committed with varying degrees of deliberateness. The borderline between negligence and intentional dishonesty may be very narrow. The result is objectionable in any case, even if different degrees of discipline are appropriate.

4.1 Misconduct in research and scholarship includes, but is not limited to, any of the following modes of behaviour:

- i. *Fabrication*: Making up data, source material, methodologies or findings, including graphs and images.
- ii. *Falsification*: Manipulating, changing, or omitting data, source material, methodologies or findings, including graphs and images, without acknowledgement and which results in inaccurate findings or conclusions.
- iii. *Destruction of research records*: The destruction of one's own or another'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.
- iv. *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.
- v. *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 acknowledgment of the source, or justification.
- vi. *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.
- vii. *Inadequate acknowledgement*: Failure to appropriately recognize contributions of others in a manner consistent with their respective contributions and authorship policies of relevant publications.
- viii. *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 Framework (Section 1.3) from being met.
- ix. 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.
- x. Applying for and/or holding an Agency award when deemed ineligible by NSERC, SSHRC, CIHR or any other research or research funding organization world-wide for reasons of breach of responsible conduct of research policies such as ethics, integrity or financial management policies.

- xi. Listing of co-applicant, collaborators or partners without their agreement.
- xii. Using grant or award funds for purposes inconsistent with the policies of TRU or Funding Agencies; misappropriating grants and award funds; contravening TRU or Funding Agency financial policies, in particular the *Tri-Agency Financial Administration Guide*, Agency grants and awards guides; or providing incomplete, inaccurate or false information on documentation for expenditures from grant or award accounts.
- xiii. Failing to meet TRU or Funding Agency policy requirements or, to comply with relevant policies, laws or regulations, for the conduct of certain types of research activities; failing to obtain appropriate approvals, permits or certifications before conducting these activities.

(* The definitions in this section mirror those detailed in the Tri-Council's Responsible Research Framework document, and have drawn from the following sources: CCA (2010). *Honesty, Accountability and Trust: Fostering Research Integrity in Canada*. Ottawa: Council of Canadian Academies; the Singapore Statement on Research Integrity, 2nd World Conference on Research Integrity, 21-24 July 2010; the Committee on Publication Ethics (COPE) www.publicationethics.org; and the University of Toronto, 'Framework to Address Allegations Of Research Misconduct' Nov. 7 2006.)

5. ALLEGATIONS OF MISCONDUCT

Receiving Allegations: Allegations of misconduct in research and scholarship may be made by any person. Confidential enquiries, allegations of breaches of policies and information related to allegations, should be directed to the Vice-President Academic.

- 5.1 Allegations of misconduct, inquiries and investigations under this Policy will generally be handled confidentially provided: (i) a person accused of misconduct will generally be entitled to know the identity of the person who has accused them; (ii) TRU makes public statistical annual reports on confirmed findings of misconduct in research or scholarship, including actions taken, and (iii) TRU is obligated to report on alleged misconduct to the Secretariat on Responsible Conduct of Research (SRCR); and (iv) all research activities are subject to applicable laws, including the BC Freedom of Information and Protection Privacy Act, which have specific reporting requirements.

TRU may independently, or at and Agency's request in exceptional circumstances, take immediate action to protect the administration of Tri-Council funds. Immediate actions could include freezing grant accounts, requiring a second authorizing signature from a TRU representative on all expenses charged to the researcher's grant account, or other measures as appropriate.

Upon receipt of an allegation, the Vice-President Academic will automatically initiate an initial inquiry process to establish whether an allegation is responsible and if a formal investigation is required. The Vice-President Academic will have no other role with regard to such an allegation of misconduct, except as set out in this policy. Alleged misconduct may be resolvable through informal consultation. Should a power imbalance exist in the relationship

between parties (e.g., between student and teacher) which might prevent an informal resolution, each of the complainant and respondent has the right to request and receive a formal hearing.

- 5.2 An initial inquiry will normally be referred to and conducted by the relevant dean, working in consultation with the Associate Vice-President Academic; where appropriate, the parties will work toward an education-focused solution. This initial inquiry will provide the complainant and respondent with an opportunity to be heard and allow for the respondent to appeal if a breach of policy is confirmed.
- 5.3 If the complaint is not carried beyond the stage of informal inquiry, TRU shall seal all written record of the names of the parties and the particulars of the allegation(s); such records will be destroyed one year after the inquiry is concluded.
- 5.4 **Formal Investigation:** Should informal inquiry fail to resolve the matter, a formal complaint may be made to the Vice- President Academic.
 - i. At this point, allegations of misconduct must be submitted to the Vice-President Academic in writing, normally within six months of the alleged misconduct. If the Vice-President Academic was a party to the alleged misconduct, the President will assume the Vice-President's role in applying this policy.
 - ii. Allegations must detail and document the alleged misconduct.
 - iii. Allegations normally must be dated and signed by the complainant. However, the Vice-President may elect to initiate an investigation under this Policy upon receipt of compelling evidence submitted anonymously.
 - iv. An individual making an allegation in good faith or providing information related to an allegation is entitled to rely on the University's Whistleblower Protection Policy. Similarly, TRU will make every effort to protect, to the extent possible, the identity of the respondent and the nature of the allegation until/ unless misconduct has been determined. The University will protect personal information and deal with records in accordance with the *Freedom of Information and Protection of Privacy Act*.
- 5.5 Upon receipt of a formal allegation of misconduct, the Vice-President Academic or designate will request in writing a meeting with the respondent. The request will:
 - i. include a summary of the allegation;
 - ii. inform the respondent that the purpose of the meeting is to establish whether a formal investigation is required; and
 - iii. inform the respondent of the right to be accompanied by a person chosen by the respondent in this and any other future meetings (depending on the seriousness of the allegation the Vice-President Academic may in his/her discretion allow the respondent to

have counsel attend; if the Respondent is permitted to have counsel attend, he/she is required to provide notice to the Investigation Committee whether his/her counsel will attend and, if such counsel will attend, the Investigation Committee may also have counsel attend).

- 5.6 The Vice-President Academic or his designate will keep records are to be kept of all meetings in which they participate under this Article of this Policy.
- 5.7 The Vice-President Academic or designate will inform the respondent in writing whether a formal investigation is required.
- 5.8 Should a formal investigation be required, the Vice President Academic or designate will provide the respondent a full copy of the signed allegation, all of the information the Vice-President Academic or designate has relevant to the matter, and an invitation to respond to it in writing.
- 5.9 Upon deciding that a formal investigation is required, the Vice-President Academic or designate shall form an investigation committee.
 - i. The investigation committee will be appointed with the authority to decide whether a breach has occurred. The investigation committee shall normally be chaired by the Associate Vice-President Research and include senior faculty members who have the necessary expertise and who are without conflict of interest, whether real or apparent, and at least one external member who has no current affiliation with TRU. Emeritus academics are eligible to be part of an investigation committee.
 - ii. The Investigation Committee may review any Scholarly Activity relevant to the allegation, including any abstracts, papers or other methods of scholarly communication. A special audit of accounts may also be performed on the sponsored research accounts of the involved individual(s). Individual(s) may be required to prove credentials.
 - iii. The Investigation Committee has the right to examine any University documents and question any student or member of faculty and staff during its investigation. All members of faculty, staff and students (including the respondent) must cooperate fully with the Investigation Committee and make available any documents requested by the Investigation Committee in the course of its investigation.
 - iv. Both the complainant and respondent will be provided an opportunity to be heard by the Investigation Committee. The respondent will be entitled to see and make submissions with regard to all information before the Investigation Committee.
 - v. In cases of collaborative research involving other institutions, the Vice-President Academic may modify these Procedures to facilitate the conduct of parallel or joint investigations or as otherwise deemed appropriate by the Vice-President Academic.
 - vi. Subject to any applicable laws, including privacy laws, the University shall advise the relevant Tri-Council Agency or Secretariat on Responsible Conduct of Research (SRCR) immediately of any allegations related to activities funded by the Agency that may

involve significant financial, health and safety, or other risks.

- vii. The University 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. If a breach is confirmed at the formal investigation stage, TRU shall prepare a report for the SRCR on each investigation (SRCR Report) 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 SRCR 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 followed 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; and

the institutional investigation committee's decisions and recommendations and actions taken by the TRU.

The University's SRCR Report shall 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 material to the Institution's findings and its report to the SRCR.

In cases of research funded by Tri-Council, inquiry letters and investigation SRCR Reports will be submitted to the SRCR within two and seven months, respectively, of receipt of the allegation by the Institution. These timelines may be extended in consultation with the SRCR if circumstances warrant, with the understanding that monthly updates will be provided to the relevant agency until the investigation is complete.

- 5.10 Normally within 60 working days of the commencement of the formal investigation, and after considering all the evidence gathered, the Investigation Committee shall reach a decision and prepare written report to be submitted to the Vice-President Academic and the Respondent..
- 5.11 The appropriate criterion for a decision is the presence of clear and convincing evidence. The Investigation Committee report will include:
- i. a copy of the signed allegations, and the written response, if any, of the respondent;
 - ii. the findings of the Vice-President or designate as to whether the allegation has been upheld or not; and
 - iii. a statement of the reasons for the finding.

- 5.12 The report shall also describe any actions to be taken including, but not limited to, those listed below:
- i. sanctions against a respondent found to have engaged in misconduct;
 - ii. actions to protect or restore the reputation of the respondent, if wrongly accused;
 - iii. actions to protect a complainant found to have made a responsible accusation;
 - iv. sanctions against a complainant found to have made an irresponsible or malicious allegation.
- 5.13 Within seven days of receipt of the Committee's report, the Vice-President Academic will send copies of the Investigation Committee Report to the President and the relevant Deans or Directors of those involved in the allegation.
- 5.14 Sanctions will be determined by the Vice-President Academic and will depend on the severity of the offense. If sanctions are to be imposed against either the respondent or complainant, the Vice President Academic will provide that person an opportunity to be heard prior to his/her final decision regarding a sanction. In instances involving researchers and research collaborators associated with other institutions, the Vice-President Academic or designate shall, subject to applicable privacy laws, inform the Senior Administration of the collaborator's institution of the substantiated allegation of research misconduct.
- 5.15 Any disciplinary action to be taken against an employee of the University pursuant to this section 5 is subject to the provisions of any applicable collective agreement or agreement on benefits and working conditions of employment that apply to that employee.
- 5.16 Within 14 days of receiving a Investigation Committee Report, the respondent may make a final appeal of the process followed to the President. Grounds for such appeals shall be limited to failure to follow the process set out in this Policy and Regulations. Should the President find that the Investigation Committee did not follow the process set out in this Policy and Regulations, and such procedural error materially affected the findings of the Investigation Committee, a new Investigation Committee with new membership will be convened to re-hear the respondent's case.
- 5.17 The Office of the Associate Vice-President, Research will periodically prepare and publish summaries of decisions (with personal identifiers removed) for the purpose of educating University members on acceptable practices for scholarly integrity and research ethics.

6. AUTHORSHIP*

Effective and ethical dissemination of research is a significant responsibility for all researchers. In reporting scholarly research results, all authors must examine and accept responsibility for the contents of the publication, and all members of the research team must work to ensure that appropriate credit be given for work done by all contributors. If a conflict over authorship exists, the author(s) should refer the matter to the Associate Vice-President Research and Graduate

Studies or designate, who will determine the policy to be followed in the particular case.

- 6.1 TRU's policy on authorship applies principally to scholarly publications, and should be adhered to by all members of the University community. TRU recognizes that there exists a range of dissemination practices particular to individual disciplines, and even within disciplines, and thus each Faculty or School is encouraged to develop policies based on the following shared principles:
- i. Each author of a manuscript, presentation, or creative work should have made a substantial intellectual contribution and understand the significance of the conclusions. This includes, but is not limited to, conceptualization and design, substantive and critical suggestion and advice, data analysis (where applicable), material production (where applicable), and writing.
 - ii. All authors should review the final version of the submitted manuscript, and must be publicly accountable for its content.
 - iii. Decisions about author order should be discussed and agreed to by the authors early in the production of the work. Authors are normally listed in the order of the significance of their contributions, or in a manner consistent with disciplinary expectations.
 - iv. Group authorship is encouraged, providing all members of the group meet the criteria for authorship noted above.
 - v. Students working as Principal Investigators on graduating projects, theses, or dissertations should be the first author on any publication that arises from those works. Faculty members may be listed as a second author if they have met the criteria for authorship noted above and if both the student and the participating faculty member(s) agree that this is appropriate.
 - vi. If a student makes a material contribution to a faculty member's research program or project, there needs to be an agreement about authorship early in the process, ideally before the student embarks on the research project or program. This agreement should be re-evaluated as the work progresses and the relative contributions of the student are assessed by the Principal Investigator.
- 6.2 Ethical standards for shared authorship include but are not limited to the following:
- i. Referencing and, where applicable, obtaining permission for the use of all published and unpublished work, including data, source material, methodologies, findings, graphs and images.
 - ii. 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 authorship policies of relevant publications.
 - iii. Deciding on questions of authorship early in the production of the work.

- iv. Acknowledging, in addition to authors, all contributors and contributions to research, including writers, funders and sponsors.

(*The TRU policy for authorship adheres to Tri-Council guidelines and has drawn on and adapted the principles of authorship and wording common to those policies and principles developed by the University of British Columbia, the University of Northern British Columbia, and the University of Victoria.)

7. COLLECTION, STORAGE, AND AUTHENTICITY OF RESEARCH RECORDS

Research records are those documents and other records and materials recorded by or for a researcher that are necessary to document, reconstruct, evaluate, and validate research results and the events and processes leading to the acquisition of those results. Research records may exist in many forms, including but not limited to laboratory notebooks, survey documents, questionnaires, interview notes, transcripts, machine-generated data or performance outputs, recruitment materials, consent forms, correspondence, other documents, computer files, audio or video recordings, photographs including negatives, slides, x-ray films, samples of compounds, organisms (including cell lines, microorganisms, viruses, plants, animals) and components of organisms.

7.1 Collection and Authenticity

- 7.1.1 Researchers and scholars shall use scholarly and scientific rigour in the collection, recording, and analysis of data, and in the reporting of results. Research records must be retained in sufficient detail to enable the University and the involved researchers to respond to questions about research accuracy, authenticity, compliance with pertinent contractual obligations, and TRU and externally imposed requirements and regulations governing the conduct of the research. When developing a research project that involves the creation of data sets, researchers should ask the TRU Library if it can preserve the data. If it cannot or if the PI wishes to have the data deposited at another institution, researchers should consider contacting one of the members of the Canadian Association of University Libraries to enquire about data management assistance.
- 7.1.2 Principal investigators shall be involved both with and responsible for the research design and the supervision of the research work, such as data acquisition, recording, analysis, interpretation and storage.
- 7.1.3 Principal investigators shall retain accurately recorded and retrievable results. Wherever possible, all primary data shall be recorded in clear, adequate, original, and chronological form.
- 7.1.4 Principal investigator(s) must inform The Research Office about the nature and location of data in their possession.

7.2 Storage and Retention

7.2.1 Original research records shall be retained by the principal investigators in a secure location for a minimum of five (5) years following the completion of the project or study or for longer periods as required by funding agencies or funding oversight agencies or the University's Records Retention/Destruction Policy.

7.2.2 Records containing personal identifiers shall be stored in accordance with the University's Information Security Standards that can be found at the following URL: <http://www.tru.ca/its/infosecurity/Standards.html> Identifiers shall be destroyed at the date recommended by the Research Ethics Board (REB). The REB may recommend variations in storage time and methods from those referenced in the University's Information Security Standards.

7.3. Research Record Archiving

7.3.1 TRU is committed to facilitating the advancement and creation of knowledge by encouraging researchers to share research findings and data. Sharing research findings and data is the essence of academic activities and ensures that both disciplinary and interdisciplinary knowledge and understanding can be built upon and expanded. As a Canadian, publicly funded institution participating in the Tri-Council Memorandum of Understanding, TRU endorses the Tri-Council's Research Data Archiving Policy.

7.3.2. The University shall make available insofar as possible a publicly accessible data archive, managed by the Library, for the storage of research data and shall provide support and assistance to faculty using the archive to comply with the data archiving provisions of the policy on Integrity in Research and Scholarship.

7.3.3 Notwithstanding the exceptions listed herein, where required by the policies of funding agencies such as SSHRC, researchers shall deposit a copy of their research data with the institutional data archive or otherwise endeavor to make it publicly available within two years following the conclusion of the research project that generated the data. Deposit of data not specifically required by external agencies shall be optional, but encouraged.

7.3.4 The depositor maintains intellectual property rights and must be cited by anyone using data from the archive.

7.3.5 Exemptions to the requirement of 7.3.3 to deposit data in the archive shall include the following:

- i. The protection of confidentiality is of overriding importance, and no data shall be posted that contain personal identifiers such as those described in or otherwise stipulated by the University procedures on the Ethics of Research Involving

Human Participants or decisions of the REB.

- ii. The removal of identifiers may make data meaningless or prove prohibitively expensive. In such cases, the REB should be consulted for recommendations.
- iii. Consulting or contractual agreements with private companies may contain clauses that limit public release of data. However, it is understood that the principles of academic freedom require that confidentiality clauses or similar agreements do not overly limit the ability of researchers to publish.
- iv. Given the broad array of data types used in University research, it is impossible to envision all circumstances affecting collection and storage. Further requests for exemptions from this provision may be made by application to the Associate Vice-President Research.

7.4. **Secure Locations**

- 7.4.1. All research records, prior to public dissemination, should be stored in accordance with the University's Information Security Standards that can be found at the following URL: <http://www.tru.ca/its/infosecurity/Standards.html>