



Foundation for Educational Exchange between Canada and the United States of America

Integrity Policy

General Principles

The Foundation for Educational Exchange between Canada and the United States of America (Fulbright Canada) is a joint, bi-national program supported by the Department of Foreign Affairs and International Trade Canada and the United States Department of State. It provides grants to exceptional Canadian and American graduate students, faculty, professionals and independent researchers to conduct research, study, or lecture in the other country. The following guidelines are in place to create an atmosphere that encourages ethical conduct, without interfering with freedom of inquiry, and without causing unnecessary administrative burdens.

The Foundation expects of all of its members (scholars, students, fellows, staff and anyone formally affiliated with research performed with funds provided by the Foundation or in any way connected to a Foundation program) the highest standards of ethical conduct in every aspect of research, and practice, including applications, proposals, the research itself, reports and publications. The term "research" is broadly defined and is intended to include both scientific and non-scientific research.

The highest standards of ethical conduct are jointly defined by the Foundation and the Foundation's partner institutions. The Foundation's partner institutions include (but are not limited to) degree-granting colleges and universities in both Canada and the United States, along with research institutes with independent and established policies on integrity in research and scholarship. Members are expected to comply with and are subject to the policies of their host institution (defined as the institution where the member is conducting research). The home institution and/or the Foundation provide a secondary source of policies that may be referred to under certain circumstances, and, in particular, where such policies are not formally enumerated by a host institution. Broadly speaking, members are expected to respect the most stringent guidelines as set out by all participating institutions that are directly and/or indirectly involved in their research.

The Foundation holds its members responsible for upholding the following principles:

- recognizing the substantive contributions of collaborators and students; using unpublished work of other researchers and scholars only with permission and with due

acknowledgement; and using archival material in accordance with the rules of the archival source;

- obtaining the permission of the author before using new information, concepts or data originally obtained through access to confidential manuscripts or applications for funds for research or training that may have been seen as a result of processes such as peer review;
- using scholarly and scientific rigour and integrity in obtaining, recording and analysing data, and in reporting and publishing results; ensuring that authorship of published work includes all those who have materially contributed to, and share responsibility for, the contents of the publication, and only those people; and,
- revealing to sponsors, universities, journals or funding agencies, any material conflict of interest, financial or other, that might influence their decisions on whether the individual should be asked to review manuscripts or applications, test products or be permitted to undertake work sponsored from outside sources.

Having said this, it is important to note that:

It is neither possible nor desirable to foresee or to define what constitutes ethical conduct in all circumstances. This policy leaves many such matters untouched: it does not, for example, apply to the question of whether a certain kind or line of research is itself ethical.

Misconduct in research includes any deviation from the principles listed above.

Proper ethical procedures can be encouraged by increasing awareness of ethical issues at the outset. Room for misunderstanding may be reduced by precision in the terms of an award. The Foundation endeavours to promote a high standard of ethical conduct among all of its members.

Procedures for Dealing with Allegations and/or Complaints

Allegations of misconduct will be taken seriously by the Foundation. In accordance with the established practices and procedures of the Foundation, all inquiries and proceedings will be conducted expeditiously.

The Foundation expects that its members will comply with the established practices and procedures of the appropriate partner institution. As such, the Foundation will respect and support practices and procedures at said institution relating to:

- receiving allegations of misconduct
- conducting inquiries/investigations into allegations of misconduct
- protecting the privacy/confidentiality of the complainant, the respondent, and the materials pertaining to the investigation
- providing an opportunity for due process
- making decisions on misconduct

- determining actions in response to such decisions
- reporting on the results of the investigation
- maintaining records of the investigation
- reporting the conclusions reached and actions taken to the appropriate institution(s), including the appropriate Council(s) and the Foundation

In such cases where a member is not directly affiliated with an institution with the established policies and procedures to respond to an allegation of misconduct, the Foundation will proceed as follows:

Instances of alleged misconduct in research may be resolvable through informal consultation. It is acknowledged that there may be a power imbalance in the relationship between the parties (i.e., between graduate student and senior supervisor) that might prevent this. If the complaint is not carried beyond this stage, the Foundation shall maintain no written record of the names of the parties or of the precise particulars of the allegation.

A formal allegation of misconduct in research may be made by any person. It should normally be made within six months of the alleged misconduct. Allegations of misconduct in research are to be directed in writing to the Chair of the Audit Committee of the Foundation's Board of Directors (the Chair). They should include all relevant evidence, appropriately documented, and they must normally be signed and dated. If an allegation is incomplete or otherwise improperly documented, the Chair may contact the complainant and inform him or her of the deficiency in the form of the allegation. Anonymous allegations will not normally be considered; however, if compelling evidence of misconduct is received anonymously by the Chair, he or she may initiate the investigation process described below, on the basis of this evidence. If the Chair is a party to the alleged misconduct, then another member of the Audit Committee of the Board of Directors will assume the role of the Chair under this policy.

Upon receipt of an allegation of misconduct in research, the Chair or his/her designate, in order to determine whether a formal investigation is warranted, will promptly request in writing an informal meeting with the respondent. Notice of this meeting shall inform the respondent that an allegation of misconduct has been received and that the purpose of the meeting is to help determine whether a formal investigation is warranted; it will include a brief summary of the allegation. This notice shall also inform the respondent of the right to be accompanied by a person of his or her choice in this and any future meetings, hearings or other sessions related to a formal investigation. Any statements made at this meeting will be without prejudice and no formal record will be kept of the proceedings of this meeting.

The Chair will decide whether or not a formal investigation is warranted and so inform the respondent and the complainant in writing, normally within 15 working days of receipt of the allegation. If the Chair finds that a formal investigation is not warranted, the allegation shall be dismissed. If the Chair finds that a formal investigation is warranted, the notice to the respondent shall enclose a full copy of the signed allegation and an invitation to respond to it in writing.

The Chair or designate(s) shall investigate the allegations promptly, fairly, judiciously and confidentially. The procedures to be followed are guided by the principle of fairness, applicable to all parties. The respondent and complainant will have adequate opportunity to know any evidence presented by any party and to respond to that evidence if he or she so chooses. If the investigation is conducted by designate(s), its purpose shall be fact-finding and formulation of a recommendation as to whether misconduct in research occurred. Procedures for conduct of the investigation are appended to this policy.

Normally within 35 working days of the commencement of the formal investigation, and after considering all the evidence gathered by him/her or the designate(s), the Chair shall reach a decision and prepare a draft written report. The report shall include a copy of the signed allegation, the written response, if any, of the respondent and the findings of the Chair as to whether the allegation has been upheld or not, with a statement of the reasons for the finding. The appropriate criterion for a decision is the presence of clear and convincing evidence. The report shall also describe actions, if any, to be taken.