

July 21, 2014

**From:** Morteza Shirkhanzadeh **Sent:** July 21, 2014 2:38 PM

**To:** [REDACTED] **Subject:** Breaches of Agency Policies by Queen's University

Dear [REDACTED]

**Re: Breaches of Agency Policies by Queen's University**

On [REDACTED] you informed me that the Secretariat does not have the authority to investigate allegations concerning individual researchers. You advised me to send my allegations directly to the institution's designated point of contact, in writing, with an exact copy sent to SRCR (see attachment-A).

Accordingly, I sent my allegations of research misconduct to Queen's University in three separate e-mails dated November 28 (Attachment -B), December 11 (Attachment- C) and December 16, 2012 (Attachment- D). In each case, an exact copy of the allegation was also sent to SRCR. These communications are all pertained to the allegation of redundant publication which falls within the breaches set out in Section 3 of the tri-council framework.

On [REDACTED] I received a redacted version of the investigation report from Queen's University. I have now reviewed this report and have discovered that Queen's University did not comply with the agency policies to determine the validity of the allegations of redundant publication submitted in 2012.

According to the Panel on Responsible Conduct of Research (PRCR), it is the institution's responsibility to review the allegations during the inquiry phase to determine whether the allegations are responsible. A responsible allegation is an allegation which falls within one or more breaches set out in Section 3 of the tri-council framework. You will note that the allegation of 'redundant publication' is a responsible allegation.

It is clear from the letter I received from the [REDACTED] (Attachment-E) that the allegations were not dismissed during the inquiry phase and in fact the [REDACTED] concluded that the allegations should be investigated by an investigative committee.

The investigative committee appointed by Queen's University was expected to collect and examine relevant materials to determine the validity of the responsible allegation (redundant publication) as submitted. The report shows that the committee did not determine the validity of the responsible allegations. Instead, the committee arbitrary changed the allegations to "self-plagiarism" to avoid addressing the actual breach of the agency policy. It is clear that self-plagiarism does not fall within the breaches set out in section 3 of the tri-council framework and the committee was fully aware that this term is not even mentioned in the institution's research integrity policy.

The institution did not determine the validity of the responsible allegations. This is in non-compliance with the agency policy.

There are other problems with the investigation process:

- (a) Substantive materials submitted by one key complainant were not examined by the investigative committee (Attachment -F).
- (b) The University did not comply with the requirement that the Committee should include at least one “external member who has no current affiliation with the institution or any party associated with the matter.” According to the Framework, “The requirement for an external member is to provide the respondent, the complainant and the institution with an unbiased, objective perspective in the review of the allegation.” (Attachment -G)

I would like the allegations of the institutional non-compliance to be investigated.  
I look forward to hearing from you.

Sincerely,

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