

The background image shows a modern, multi-story building with a grid-like facade of windows, identified by a sign as the Erasmus University building. In the foreground, there is a curved, elevated walkway with a metal grate surface and railings, crossing a body of water. A person is walking on this path. The scene is set in a landscaped area with trees and a clear sky.

Annual report

Legal Procedures

EUR 2024

Table of contents

Abbreviations	2
Preface	3
1. Advisory Committee for Complaints and Objections, AKB	5
§ 1.1 Statutory framework (article 7:13 Awb, title 9.1 Awb)	5
§ 1.2 Number of objections	6
§ 1.3 External appeals (article 7:12, 6:23 Awb)	6
§ 1.4 Number of complaints	6
§ 1.5 External appeals to Nationale Ombudsman (article 9:12 paragraph 2, 9:17 and 9:24 Awb)	7
2. Board of Appeals for Examinations, CBE	8
§ 2.1 Statutory Framework (article 7.59a paragraph 3, 7.60 and 7.61 WHW)	8
§ 2.2 Numerical overview of cases	9
§ 2.3 External appeals to the Administrative Jurisdiction Division of the Council of State (article 7.64 WHW)	11
3. Staff Disputes Committee, CGW	12
4. Whistleblower Committee, CK	13
§ 4.1 Introduction	13
§ 4.2 Statutory framework (Whistleblower act, title 9.1 Awb and the GDPR)	13
§ 4.3 Reports	13
§ 4.4 Handling term	14
§ 4.5 External reports to the House for Whistleblowers	14
5. Committee on Undesirable Behaviour, COG	15
§ 5.1 Introduction	15
§ 5.2 Statutory framework (article 3 Working Conditions Act, General Equal Treatment Act, article 7.63A WHW and title 9.1 Awb)	15
§ 5.3 Advices	15
§ 5.4 External appeals to Nationale Ombudsman (article 9:12 paragraph 2, 9:17 and 9:24 Awb)	16
§ 5.5 Clarification	16

6. Committee Scientific Integrity, CWI	17
§ 6.1 Statutory framework (article 1.7 WHW)	17
§ 6.2 Advices	17
§ 6.3 External appeals to LOWI (article 5 paragraph 2 KWI)	17
§ 6.4 External appeals to National Ombudsman (article 9:12 paragraph 2, 9:17 and 9:24 Awb)	18
7. Legal Protection Facility, FR	19
§ 7.1 Statutory framework (article 7.59a WHW)	19
§ 7.2 Reports	19
8. Student Objection Advisory Committee, GAS	20
§ 8.1 Statutory framework (article 7.63a WHW)	20
§ 8.2 Number of cases	20
§ 8.3 External appeals at RvS (article 7.64 WHW)	20
9. Disputes Resolution Committee for Non-Initial Education, GNIO	22
§ 9.1 Statutory framework (article 7:900 BW)	22
§ 9.2 Number of cases	22
§ 9.3 External appeal in civil court (article 25 Reglement GNIO)	22
§ 9.4 Scope of dispute resolution by GNIO	23
10. Website Legal Procedures	24

Abbreviations

AKB	Advisory Committee for Complaints and Objections
AVG	General Data Procedures Regulation
Awb	General Administrative Law Act
CBE	Board of Appeals for Examinations
CGW	Dispute Committee Employees
CK	Whistleblower Committee
COG	Committee on Undesirable Behaviour
CvB	EUR Executive Board
CWI	Committee Scientific Integrity
EMC	Erasmus Medical Centre
ESE	Erasmus School of Economics
ESHCC	Erasmus School of History, Culture Communication
ESHPM	Erasmus School of Health Policy & Management
ESL	Erasmus School of Law
ESPhil	Erasmus School of Philosophy
ESSB	Erasmus School of Social and Behavioural Sciences
EUC	Erasmus University College
EUR	Erasmus University Rotterdam
FGG	Faculty of Medicine and Health Sciences
FR	Facility Legal Protection
GAS	Student Objection Advisory Committee
GNIO	Disputes Resolution Committee for Non-Initial Education
LOWI	National Board for Research Integrity
RSM	Rotterdam School of Management
RvS	The Administrative Jurisdiction Division of the Council of State
WHW	Higher Education and Scientific Research Act

Preface

This annual report provides an overview of the objections and appeals, disputes, notifications, and complaints handled in 2024 by the Legal Procedures department.

EUR has eight (8) independent committees established by the Executive Board. These committees are supported both substantively and procedurally by the Legal Procedures department. In cases of complaints and objections, the committees provide advice to the Executive Board and, upon request, to other governing bodies. Additionally, the Legal Procedures department manages the secretariat for appeal cases at the CBE, as well as for disputes submitted to the GNIO and the CGW.

In line with the legal obligation, a Legal Protection Facility has been set up as a central digital portal for submitting objections, appeals, disputes, and complaints by students and external parties. This portal, managed by the Legal Procedures department, is also used in practice by other members of the university community. The Legal Procedures department ensures timely and correct forwarding to the competent authorities and provides submitters with information about the further course of the procedure.

In 2024, 655 cases were received by the legal protection committees and boards of EUR, of which 71 cases resulted in a decision or advice. Additionally, the Legal Protection Facility handled 255 cases.

Table 1 – Number of complaints, disputes, appeals and objections received

	2024	2023	2022	2021
Total	655	580	573	683
AKB	15	14	10	22
- Objection	11	7	8	6
- Complaint	4	7	2	16
CBE	281	228	207	307
CWI	2	4	1	5
GAS	93	71	45	66
GNIO	6	1	3	19
FR	255	250	296	254
COG	2	8	9	9
CK	0	2	2	1
CGW	1	2	0	0

Table 2 provides a numerical overview of the total number of cases in which a decision has been made or advice has been given. Cases that are settled during the proceedings are not included in Table 2. This information can be found in the tables of the individual committees.

Table 2 – Number of cases handled by a committee.

	2024	2023	2022	2021
Total	71	77	88	138
AKB	8	6	8	19
- Objection	6	4	6	4
- Complaint	2	2	2	15
CBE	49	38	53	79
CWI	2	0	0	1
GAS	11	29	22	27
GNIO	1	1	2	6
COG	0	2	3	5
CK	0	0	0	1
CGW	1	1	0	0

1. Advisory Committee for Complaints and Objections, AKB

§ 1.1 Statutory framework (article 7:13 Awb, title 9.1 Awb)

The [AKB](#) advises the administrative bodies of EUR on the (un)foundedness of objection letters and on the handling of complaints.

Objections

Interested parties can directly submit an objection against a decision made by an administrative body of EUR through the Legal Protection Facility. The AKB acts as an independent advisory committee and advises the Executive Board (CvB) on the handling of objections. Based on this advice, the CvB makes a formal decision on the objection.

In certain cases, the AKB also advises other administrative bodies within EUR upon request. This authority is derived from Article 7:13 of the General Administrative Law Act (Awb) and Article 3.7 of the AKB Regulations. Not every objection leads to advice; some are withdrawn during the procedure in consultation.

Objections from students and extranei do not generally fall under the AKB but are handled by the Student Objection Advisory Committee (GAS), as further explained in Chapter 8.

Complaints

Anyone can file a complaint about the behavior of an administrative body or individuals working under the responsibility of that body—even if they are not part of the university community.

Pursuant to Article 9:14 of the Awb, in conjunction with Article 3.7 of the AKB Regulations, the AKB can act as an independent advisory committee not only for the CvB but for all administrative bodies of EUR upon request. After advising, the involved administrative body informs the complainant in writing and with reasons about:

- the findings from the investigation;
- the advice given;
- whether the advice is followed; and
- what consequences are attached to it.

§ 1.2 Number of objections

Table 3 – Outcome of objections handled

	2024	2023	2022	2021
Total	11	7	8	6
Settled or withdrawn	2	3	2	2
Advices		4	6	4
– Inadmissible	9	0	0	2
– Unfounded	2	4	4	2
– Well founded	3	0	0	0
– Partially well founded	0	0	1	0
– Motion for recusal	0	0	1	
– Dismissed	2	x	x	
– Suspended	2	x	x	

§ 1.3 External appeals (article 7:12, 6:23 Awb)

An appeal against a decision on an objection can be lodged with the Administrative Jurisdiction Division of the Council of State (RvS). In 2024, this did not occur.

§ 1.4 Number of complaints

Table 4 – Outcome of complaints handled

	2024	2023	2022	2021
Total	4	7	2	16
Advices	4	2	2	15
– Inadmissible	0	0	0	0
– Unfounded	1	1	1	6
– Well founded	1	0	1	0
– Partially well founded / unfounded	0	0	0	1
– Not processed	2	1	0	8
Settled / withdrawn	0	2	0	1
No response received from complainant	0	3	0	0

§ 1.5 External appeals to Nationale Ombudsman (article 9:12 paragraph 2, 9:17 and 9:24 Awb)

A complainant who disagrees with the way the complaint has been handled can submit a request to the [National Ombudsman](#) within one year. This option is not available to the accused: if the accused disagrees with the outcome of the complaint handling, a complaint must first be filed with the relevant administrative body. During the reporting year, it was not reported that a petition regarding the complaint handling was submitted to the National Ombudsman.

2. Board of Appeals for Examinations, CBE

§ 2.1 Statutory Framework (article 7.59a paragraph 3, 7.60 and 7.61 WHW)

Chapter 7, Title 4 of the Higher Education and Research Act (WHW) regulates the legal protection of students and extranei. Every university has a CBE. This board is authorized to rule on administrative appeals against decisions made by examination boards and examiners, binding study advice, and admissions to programs or exams within funded initial programs.

Before the CBE substantively handles an appeal, it is first forwarded to the administrative body that made the decision. That body then investigates together with the student whether an amicable settlement is possible. If the appeal is directed against an examiner, the appeal is forwarded to the relevant examination board. In practice, this often leads to a settlement.

A student can lodge an appeal if they believe that a decision (or lack thereof) is contrary to applicable rules, or is unreasonable and unfair. The CBE assesses whether this is indeed the case.

In 2024, an amicable settlement was reached in 70 of the 281 cases submitted. If no settlement is reached, the CBE handles the appeal. In that case, unless the appeal is withdrawn in the meantime, a hearing is organized and a decision follows thereafter.

All decisions of the CBE are published in an anonymized form on the [EUR-website](#).

§ 2.2 Numerical overview of cases

Table 5 –Number of appeals submitted by faculty, abbreviations are listed on page 2

	2024	2023	2022	2021
Total	281*	228	207	307
FGG	26	20	15	22
ESE	53	55	44	72
ESHCC	18	8	9	9
ESHPM	28	17	7	15
ESL	33	39	38	48
ESPhil	2	2	2	2
ESSB & EUC**	76	45	49	66
RSM	38	42	43	73

* The difference of seven (7) cases can be explained by the fact that some students submit an appeal without mentioning their faculty. When no further contact can be established with the student in question, the case is closed without the faculty being determined.

** The EUR annual report publishes the number of students for the ESSB & EUC faculties combined.

Table 6 – The percentage of students within a faculty that appealed to the CBE

	2024	2023	2022	2021
FGG	0.60	0.56	0.42	0.59
ESE	0.79	0.82	1.23	1.93
ESHCC	0.75	0.34	0.25	0.24
ESHPM	2.04	1.19	0.19	0.40
ESL	0.75	0.80	1.06	1.29
ESPhil	0.23	0.24	0.06	0.05
ESSB & EUC*	1.27	0.77	1.37	1.77
RSM	0.48	0.55	1.20	1.96

* The EUR annual report publishes the number of students for the ESSB & EUC faculties combined.

The above ratio provides a basis for faculty reflection on decisions and communication with students.

Table 7 – Outcomes cases handled

	2024	2023	2022	2021
Total	281	228	207	316
Settled/withdrawn	203	190	154	237
Closed/incompetent*	29	X	X	X
Decisions:	49	38	53	79
– (Clearly) inadmissible	3	7	7	6
– Unfounded	39	29	37	56
– Well founded	7	2	9	17

* Since 2024, we have been tracking how many cases have been reported after which the student does not reply to any attempts at contact. These cases are not officially withdrawn, but at some point, they are archived as closed.

Table 8 – Outcomes handled appeals per faculty 2024

	Unfounded	Well founded	Inadmissible	Total
Total	39	7	3	49
FGG	3	1	0	4
ESE	10	2	0	12
ESL	9	0	0	9
ESSB	8	2	0	10
ESHCC	3	0	0	3
ESHPM	1	0	1	2
ESPHIL	0	1	0	1
RSM	5	1	2	8

§ 2.3 External appeals to the Administrative Jurisdiction Division of the Council of State (article 7.64 WHW)

An appeal against a decision of the CBE can be lodged with the Administrative Jurisdiction Division of the Council of State (RvS). As of January 1, 2023, the RvS replaces the former Higher Education Appeals Board (CBHO).

Decisions of the RvS are public and can be accessed via [RvS](#). The previous case law of the CBHO remains relevant for legal development.

In the appeal procedure at the CBE, it is legally assessed whether the contested decision was made lawfully. The Council of State also conducts a legal assessment but may reach a different judgment based on a different weighing of the facts.

Legal Procedures handles the CBE's representation in proceedings at the RvS.

Table 9 - Number of RvS decisions on CBE decisions

	2024	2023	2022	2021
Total	5	3	9	10
Withdrawn	0	0	0	1
Unfounded	2	3	5	6
(Partially) well founded	2	0	2	2
Inadmissible	1	0	1	0
Incompetent	0	0	1	1

3. Dispute Committee Employees, CGW

Since the entry into force of the Public Servants Standardisation of Legal Status Act (Wnra) on January 1, 2020, employees of EUR are no longer considered civil servants. This means that the Awb no longer applies to the legal relationship with employees, and disputes regarding this will henceforth be submitted to the civil court. As a result, the AKB is no longer authorized to handle objection letters related to the legal status of employees.

In consultation with employee organizations, the former VSNU (now UNL) agreed that employers would establish a sectoral disputes committee for employees, the CGW. This committee functions as an independent advisory body that advises the employer on the handling of certain employment-related disputes. The CGW can only be engaged in disputes related to the following, exhaustively listed subjects:

- a. Personnel assessment;
- b. Change of position without prior agreement or contract with the employee;
- c. Denial of promotion to the functional scale;
- d. Granting, rejection, withdrawal, or repayment of study facilities;
- e. Denial of permission to perform ancillary activities;
- f. Compliance with salary agreements and implementation of the choice model;
- g. Compliance with leave entitlements.

Table 10 – Number of cases from 2021

	2024	2023	2022	2021
Total	1	2	0	0
Withdrawn	0	1	0	0
Unfounded	1	0	0	0
(Partially) well founded	0	0	0	0
Inadmissible	0	1	0	0
Incompetent	0	0	0	0

4. Whistleblower Committee, CK

§ 4.1 Introduction

The Executive Board attaches great importance to a safe environment where suspicions of misconduct within the university can be reported and handled carefully. Although EUR is committed to an open and honest organizational culture, it acknowledges that misconduct can occur. Employees or stakeholders who report a wrongdoing in good faith are protected under the [Whistleblowers protection act](#).

A suspicion of a serious misconduct – meaning an illegal or immoral practice that may have significant societal or institutional consequences and has occurred under the responsibility of EUR – can be reported according to the rules described in the EUR Regulations on Reporting Suspected Misconduct. This whistleblower policy not only outlines the reporting procedure but also how the legal protection of the reporter is ensured.

As part of the integrity policy, the procedure provides the opportunity for a suspicion of misconduct to be investigated by a committee, consisting of a chairperson and members who are independent and do not hold any position within EUR. Upon completion of the investigation, the committee reports to the Executive Board, which can then decide to take appropriate measures.

§ 4.2 Statutory framework (Whistleblower act, title 9.1 Awb and the AVG)

The '[EUR Whistleblowers Regulations](#)' provides the opportunity to submit a report to the CK regarding a suspicion of misconduct. A report is handled in accordance with the Whistleblowers Protection Act and, where applicable, the provisions in the Awb and the AVG.

§ 4.3 Reports

Table 11 – Outcomes received reports

	2024	2023	2022	2021
Total	0	2	2	1
– Withdrawn	0	1	0	0
– Unfounded	0	0	0	1
– Well founded	0	0	0	0
– Inadmissible	0	0	0	0
– Complaint not processed	0	1	2	0

§ 4.4 Handling term

Within six weeks of receiving the report, the CK decides whether the report will be processed. During the further handling, the involved parties are regularly informed by the CK about the progress of the procedure.

§ 4.5 External reports to the House for Whistleblowers

Throughout the entire procedure, an external report of the suspicion of misconduct can be made to or via the [House for Whistleblowers](#). This external report, insofar as it concerns the information provided to the House for Whistleblowers, is not considered a violation of the confidentiality obligation as referred to in article 2.4 of the EUR Regulations on Reporting Suspected Misconduct. For all other information, the confidentiality obligation remains fully in effect.

If there is a reasonable suspicion of a criminal offense or serious danger to public health or environmental safety, both the reporter and the EUR are free to report this directly to the competent authority.

5. Committee on Undesirable Behaviour, COG

§ 5.1 Introduction

Complaints about undesirable behavior are handled by the COG according to the provisions of the Awb. A complaint can be submitted directly to the COG by the complainant. This direct route helps to limit the number of parties involved, which is in line with the confidential nature of this type of complaints.

§ 5.2 Statutory framework (article 3 Working Conditions Act, General Equal Treatment Act, article 7.63a WHW and title 9.1 Awb)

The [EUR Complaints Procedure for Undesirable Conduct](#) provides the opportunity to submit a complaint to the COG regarding (sexual) harassment, aggression, violence, bullying, and discrimination. The COG decides, in accordance with the complaints procedure, on how to handle a written complaint. After completing the investigation, the COG issues advice to the CvB. Based on this advice, the CvB decides on the complaint and any measures to be taken.

§ 5.3 Advices

Table 12 – Outcomes handled complaints

	2024	2023	2022	2021
Total complaints received	2	8	9	9
(Partially) well founded	0	0	1	0
(Partially) unfounded	0	1	1	4
Inadmissible	0	1	0	1
Withdrawn	0	2	1	1
Referred to AKB	0	1	0	1
Not taken into consideration**	2	3	3	2
Unable to provide advice on (un)substantiated nature	0	0	1	0
Handled by external agency	0	0	2	0

** This includes complaints that have been referred to other organizations, or cases where the accused has no legal relationship with the EUR.

§ 5.4 External appeals to Nationale Ombudsman (article 9:12 paragraph 2, 9:17 and 9:24 Awb)

A complainant who disagrees with the way the complaint has been handled can submit a request to the [National Ombudsman](#) within one year. This option is not available for the accused: if the accused disagrees with the outcome of the complaint handling, a complaint must first be filed with the relevant administrative body.

During the reporting year, it was not known that a petition regarding the complaint handling was submitted to the National Ombudsman.

§ 5.5 Clarification

The COG is asked to assess the validity of a submitted complaint. When the complaint is declared founded, it means that the complainant has sufficiently demonstrated that the behavior in question actually occurred. Conversely, if the complaint is declared unfounded, it means there is insufficient evidence that the behavior took place.

In cases where the COG cannot make a balanced judgment, it is indicated - in line with the approach of the National Ombudsman - that based on the submitted facts and circumstances, no statement can be made about the (partial) validity or invalidity of a complaint.

In some cases, complaints are dismissed. The main reason for this is that the person complained about has no legal relationship with the EUR.

6. Committee Scientific Integrity, CWI

§ 6.1 Statutory framework (article 1.7 WHW)

EUR places great importance on integrity and the ethical aspects of scientific research. All involved have a personal responsibility to act with integrity within scientific research. Integrity in research is based on the following core principles: honesty, diligence, transparency, independence, and responsibility.

The [Dutch Code of Conduct for Scientific Integrity](#) provides further elaboration of the fundamental principles of integrity in research and serves, in the sense of the WHW, as a guideline for universities.

One of the instruments to ensure scientific integrity is the right to file a complaint if (there is suspicion that) EUR employees violate scientific integrity. Such complaints can be submitted to the CWI.

The CWI handles the complaint in accordance with the [Complaints Procedure for Scientific Integrity EUR 2020](#). After investigation, the committee provides advice to the CvB, after which the CvB establishes a preliminary or so-called initial judgment within two weeks.

§ 6.2 Advices

Table 13 – Outcomes handled complaints

	2024	2023	2022	2021
Total complaints handled	2	4	1	5
Well founded	0	0	0	1
(Partially) Unfounded	1	X	X	X
(Partially) Inadmissible	1	X	X	X
Not taken into consideration*	0	4	0	1
Incompetent	0	0	0	3
Withdrawn	0	0	1	0

* Cases at Erasmus MC and at EUR-Holding B.V. are investigated by the CWI of that organization.

§ 6.3 External appeals to LOWI (article 5 paragraph 2 KWI)

Complainant(s) and respondent(s) can [request the LOWI](#) to provide advice on the initial judgment of the CvB within six weeks after receiving it. In 2024, this option was not utilized.

§ 6.4 External appeals to National Ombudsman (article 9:12 paragraph 2, 9:17 and 9:24 Awb)

A complainant who disagrees with the way the complaint was handled can submit a request to the [National Ombudsman](#) within one year. This option is not available for the respondent: if the respondent disagrees with the outcome of the complaint handling, a complaint must first be filed with the relevant administrative body.

In the reporting year, it was not known that a petition regarding the complaint handling was submitted to the National Ombudsman.

7. Legal Protection Facility, FR

§ 7.1 Statutory framework (article 7.59a WHW)

Under article 7.59a WHW, every higher education institution is required to offer a digital facility where students and external candidates can submit their requests, complaints, objections, and appeals. At EUR, this facility is managed by Legal Procedures.

Incoming notifications are forwarded by Legal Procedures to the competent handler within 48 hours, based on the [Working guide handling messages from students and externals](#). In practice, Legal Procedures typically does not receive feedback on how the notification was handled by the handler.

In many cases, a notification leads to a decision against which objection or appeal is possible, after which substantive handling takes place within Legal Procedures. Notifications from individuals who are not students or extranei are also processed through the facility.

§ 7.2 Reports

Table 14 – Number of submitted complaints per category

	2024	2023	2022	2021
Total	255	250	210	254
AKB/CBE/GAS/CWI	83	95	86	84
Faculty / dean *	121	86	88	129
Maintenance **	1	3	0	1
Student administration ***	36	25	11	21
Other	14	41	25	19

* Notifications about education or faculty

** Notifications about buildings, grounds, and/or university facilities and amenities

*** Notifications about admission, tuition fees, etc.

8. Student Objection Advisory Committee, GAS

§ 8.1 Statutory framework (article 7.63a WHW)

The [GAS](#) provides advice to the CvB on objections from students and extranei concerning written decisions made by the institution's bodies, insofar as the CBE is not authorized to rule on them. These must be decisions made based on the WHW or regulations derived from it.

§ 8.2 Number of cases

Table 15 – Outcomes advices GAS

	2024	2023	2022	2021
Total	93	71	45	66
Settled or withdrawn	67	42	24	40
Closed or incompetent*	14	X	X	X
Advices general	11	29	21	26
– Inadmissible	0	2	0	0
– Unfounded	8	24	20	23
– Well founded	3	2	0	2
Advices Iudicium Abeundi	1	1	1	1
– Inadmissible	0	0	0	1
– Unfounded	1	1	1	0
– Well founded	0	0	0	0

* Since 2024, we have been tracking how many cases have been registered after which no further communication is received from the student. These cases are not officially withdrawn, but at some point, they are archived as closed.

§ 8.3 External appeals at RvS (article 7.64 WHW)

An appeal against a decision of the CBE can be lodged with the Administrative Jurisdiction Division of the Council of State (RvS). As of January 1, 2023, the RvS replaces the former Higher Education Appeals Board (CBHO).

Decisions of the RvS are public and can be accessed via the [RvS](#). The previous case law of the CBHO remains relevant for legal development.

In the appeal procedure at the CBE, a legal assessment is made to determine whether the contested decision was made lawfully. The Council of State also conducts a legal assessment but may reach a different conclusion based on a different evaluation of the facts.

The legal representation of the CvB in procedures at the RvS is provided by Legal Procedures. In cases where the defense in the objection procedure at the GAS was conducted by Legal Advice/Education Law, Legal Advice/Education Law also acts as the legal representation of the CvB at the RvS.

Table 16 – Number of appeals at RvS

	2024	2023	2022	2021
Total	3	6	3	0
– Withdrawn	1	0	0	0
– Unfounded	2	5	2	0
– Well founded	0	0	0	0
– Inadmissible	0	1	1	0

9. Disputes Resolution Committee for Non-Initial Education, GNIO

§ 9.1 Statutory framework (article 7:900 BW)

The [GNIO](#) is a facility for participants in non-initial programs offered by the public institution EUR (according to article 1.3, paragraph 1 WHW).

Decisions regarding these programs cannot be appealed to the CBE. Without the GNIO, participants in a non-initial program at EUR would have to rely on the civil court for disputes.

The GNIO provides dispute resolution by issuing a binding advice based on article 7:900 of the Civil Code. This is possible if the following conditions are met:

- the relevant non-initial program has stipulated in its general terms and conditions that the GNIO is authorized to advise on disputes;
- the submitter of the dispute has explicitly declared prior to the proceedings that they accept the advice issued by the GNIO as binding (article 8 of the GNIO Regulations).

The costs for handling the dispute at the GNIO are borne by the relevant non-initial program.

§ 9.2 Number of cases

Table 17 – Number of cases GNIO, per program

	2024	2023	2022	2021
Total	6	1	3	19
EMC	0	0	1	0
ESL	0	0	0	0
Master City Developer	0	0	0	0
Maritime Economics and Logistics	0	0	0	2
International Institute of Social Studies	6	1	2	1
Institute for Housing and urban development Studies	0	0	0	16
Erasmus School of Accounting and Assurance	0	0	0	0

§ 9.3 External appeal in civil court (article 25 Regulations GNIO)

Annulment of a binding advice from the GNIO is only possible by submitting the case to the civil court within two months after the advice has been sent to the parties. The court can annul the binding advice if the advice—considering its content or manner of establishment—is deemed unacceptable according to standards of reasonableness and fairness under the given

circumstances. If no appeal is made to the court within the two-month period, the binding advice becomes unassailable.

In the reporting year, no binding advice from the GNIO was submitted for judicial review.

§ 9.4 Scope of dispute resolution by GNIO

As of January 1, 2023, it has been decided to adjust the scope of dispute resolution by the GNIO as follows:

- The authority has been expanded to include disputes within all non-initial programs provided by the public institution EUR; and
- simultaneously, the authority has been limited to only those programs offered by the public institution EUR.

From that date, the GNIO is therefore exclusively authorized to handle disputes related to private law programs offered by the public legal entity EUR.

10. Website Legal Procedures

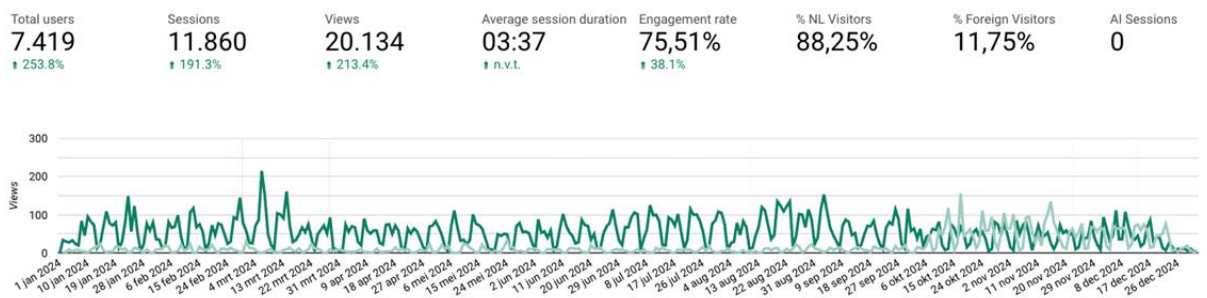
The Legal Procedures department manages a [website](#) where the most important information about legal protection within the EUR is presented briefly, concisely, and accessibly.

The website includes, among other things:

- An explanation of the objection, appeal, dispute, and complaint procedures;
- An introduction to the legal protection committees and boards; and
- The publication of annual reports.

Legal Procedures conducted a web analysis for the year 2024. This analysis shows that the website is frequently and extensively consulted. The data and information resulting from this web analysis are processed completely anonymously and in accordance with AVG legislation.

Graph 1 – General webanalysis



Graph 1 shows that the Legal Procedures website had a total of 7,419 unique visitors in 2024. The website was viewed 20,134 times, indicating that a significant portion of visitors consulted the website multiple times. On average, a user visits the website once or twice.

Furthermore, graph 1 shows that visitors spend an average of 3 minutes and 35 seconds per visit on the website. Notably, 75.51% of visitors—equivalent to 5,602 people—click through to one of the specific legal protection committees within the website, such as the CBE.

Finally, it appears that 88.25% of visitors (6,548 people) access the website from the Netherlands, while 11.75% (872 people) visit the website from a country other than the Netherlands.

