Netherlands Code of Conduct for Research Integrity 2027

Principles, standards, and duties of care for integrity in research practices

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Introduction

Research is the quest for knowledge and understanding through systematic study, observation, experimentation, reflection, and argumentation.[1] While specific disciplines and types of research differ in their methods and objectives, their common impetus is to seek a better understanding of ourselves and the world in which we live, and to share and apply the knowledge obtained. Consequently, the various forms of research play an indispensable role in society. Scientific and scholarly knowledge and understanding not only have intrinsic value, but also contribute to, among other things, policymaking, innovation, improvements in professional practices, and societal advancement more broadly.

Political and societal involvement with research has intensified in recent decades.[2] As a result, the importance of continuous alignment of the roles of science, politics, and society within this interplay has also grown. To fulfil their roles properly, all parties should respect each other's distinctiveness and autonomy. With this Code of Conduct, the research community is taking responsibility for promoting, from within, integrity in research practices and a research culture that facilitates such integrity.

This Code concerns research in the broad sense of the term, as conducted at the institutions that adopt it. It covers all the varied research disciplines, the entire spectrum from fundamental to applied and practice-oriented research, and both publicly and privately funded research.

Research derives its status in society from the fact that its results do not come about haphazardly: researchers should adhere to principles and standards in their work that safeguard the integrity of the research process. Research integrity involves various aspects: for example, research must be professionally and methodologically sound, as well as ethically responsible. Research integrity is therefore essential to the quality and reliability of research. Not only does it ensure that researchers can rely on and build upon one another's findings, it also fosters public trust in research and contributes to its societal impact.

Research integrity is essential to the quality and reliability of research.

1 Compare ALLEA. (2023). *The European Code of Conduct for Research Integrity – Revised Edition 2023*, p. 3.

2 See, for example, Rathenau Instituut. (2022). *Onafhankelijke, betrouwbare en veilige wetenschap*; KNAW. (2025). *Academische vrijheid in Nederland: reactie op actuele bedreigingen*.

This Code of Conduct sets out in greater detail what research integrity entails. It therefore serves as a central point of reference for upholding and promoting research integrity. On its own, however, a code of conduct will not automatically lead to integrity in research. This requires researchers and research institutions to put the Code to work in their day-to-day practices. The Code should become a recurring topic for reflection, discussion, and training, be taken up in institutional policy, and permeate research culture. Moreover, it is not only researchers and research institutions that create the conditions for integrity in research. The way research is organised and funded within the Dutch and European system also plays an important role. In addition, publishers, editorial boards, commissioning parties, societal partners, and others can influence the integrity of the research process. Research integrity is, in other words, a work in progress that requires sustained effort from everyone involved.

Finally, research integrity overlaps with other issues that are important for conducting sound and responsible research in a broad sense. Examples include knowledge security; collaboration with external partners; researcher recognition and rewards; the assessment of research quality; social safety; and diversity, equity, and inclusion. Each of these issues can affect the integrity of research, and vice versa. As a result, it is not always possible to draw a clear boundary between research integrity and related issues. In spite of this interconnectedness, the present Code focuses on research integrity narrowly understood. After all, a single code cannot adequately do justice to the complexity of all the above issues. Moreover, separate advisory reports, codes, and guidelines regarding these issues have already been published or are under development.[3]

This Code of Conduct is divided into five chapters:

- Chapter 1 discusses the background of the Code, describes several key terms, and establishes the scope of the Code, i.e. the activities to which it applies and who are bound by it.
- Chapter 2 identifies the five principles that form the basis of research integrity.
- Chapter 3 develops these principles into 41 standards for integrity in research practices.
- Chapter 4 formulates duties of care for institutions: board members, directors, managers, principal investigators, and supervisors are responsible for fostering a culture that encourages and safeguards integrity in research practices.
- Chapter 5 describes what constitutes violations of research integrity, the procedure to be followed in the event of suspected violations, and possible measures once violations of research integrity have been established.

3 See, for example, Rijksoverheid. (2026). *National knowledge security guidelines 2026*; Moher D, Bouter L, Kleinert S, Glasziou P, Sham MH, Barbour V, et al. (2020). The Hong Kong Principles for assessing researchers: Fostering research integrity. *PLoS Biology*, 18(7): e3000737; VSNU, NFU, KNAW, NWO & ZonMw. (2019). *Room for everyone's talent: Towards a new balance in the recognition and rewards for academics*; Declaration on Research Assessment (DORA). (2013). *The San Francisco Declaration on Research Assessment*; Coalition for Advancing Research Assessment (COARA). (2022). *The Agreement on Reforming Research Assessment*; UNL, KNAW & NWO. (2026). *Strategy Evaluation Protocol 2027–2033* (SEP); KNAW. (2022). *Social Safety in Dutch Academia: From Paper to Practice*; Horn L, Alba S, Gopalakrishna G, Kleinert S, Kombe F, Lavery J V & Visagie R G. (2023). The Cape Town Statement on fairness, equity and diversity in research. *Nature*, 615(7954), 790–793.

1. Background, scope, and transitional provisions

1.1 Background

Since the publication of the first *Netherlands Code of Conduct for Academic Practice* in 2004, there has been considerable interest in the Netherlands – but also internationally – in the importance of research integrity and the role that a code of conduct can play in this regard. In 2018, this led to the thoroughly revised *Netherlands Code of Conduct for Research Integrity* (NGWI 2018). The NGWI 2018 offered a clearer internal structure, placed explicit emphasis on institutional responsibilities for promoting and safeguarding integrity in research practices, and expanded its scope to cover applied and practice-oriented research.

In addition, the NGWI 2018 was explicitly presented as a dynamic document that can be amended in response to developments in research and society. Accordingly, a review of the NGWI 2018 was conducted in 2024 to ascertain whether it still satisfied the requirements of the research community and society at large. In its report, the evaluation committee surveyed relevant developments and made recommendations for updating the NGWI 2018 while preserving its strengths.[4] The NGWI 2027 builds on and develops the NGWI 2018 based on these recommendations. It, too, can be expected to require updating in the future.

4 See Evaluatiecommissie NGWI. (2024). *Adviesrapport. Evaluatie Nederlandse gedragscode wetenschappelijke integriteit*.

1.2 To which activities does this Code apply?

This Code concerns research in the broad sense of the term, as conducted at the institutions that adopt it. It covers all the varied research disciplines, the entire spectrum from fundamental to applied and practice-oriented research, and both publicly and privately funded research. 'Research' includes every phase of the research process, from design, execution, reporting, and assessment and peer review to communication.

The principles and standards of this Code apply to popular science publications, teaching materials, and advisory reports by researchers insofar as this can reasonably be required.

This Code also covers the use of technologies in research, including those referred to by the term 'artificial intelligence' (AI). AI technologies include, among other things, text and image generators. Because the meaning of AI is constantly evolving, however, this Code refers to technologies in general. All use of technology in research should adhere to the principles and standards set out in this Code.

There are other forms of integrity besides research integrity, such as personal, financial, and administrative integrity. For example, researchers should treat students and colleagues fairly and respectfully, and should not falsify expense claims. Although the distinction is not always sharp, this Code applies solely to research integrity.

This Code concerns research in the broad sense of the term, as conducted at the institutions that adopt it.

The principles and standards set out in Chapters 2 and 3 apply first and foremost to those who conduct research in the broad sense of the term.

1.3 Which institutions are bound by this Code?

This Code of Conduct is binding by virtue of self-regulation and therefore binding on the institutions that adopt it. The Royal Netherlands Academy of Arts and Sciences (KNAW), Dutch Research Council (NWO), Associated Applied Research Institutes (TO2 Federation), University Medical Centres of the Netherlands (UMCNL), Universities of the Netherlands (UNL) and the Netherlands Association of Universities of Applied Sciences (VH) have adopted the NGWI 2027. These organisations ensure that the institutes, universities, university medical centres, and universities of applied sciences that they represent or oversee implement this Code. Other institutions, including private enterprises, may also adopt this Code.

1.4 To whom does this Code apply?

The principles and standards described in Chapters 2 and 3 apply first and foremost to:

- those who conduct research in the broad sense of the term (researchers). This includes PhD students (whether or not employed by their university), professional doctorate candidates, visiting researchers, part-time researchers, emeritus professors, and external professionals insofar as they perform research activities;
- board members, directors, managers, principal investigators, and supervisors insofar as they (co)determine research activities in the various phases of research.

The principles and standards outlined in Chapters 2 and 3 also apply to the work of other parties involved in the research, such as research support staff, students, or participating citizens. However, only researchers as specified above can be held accountable for alleged violations of research integrity as designated in Chapter 5.

In higher education, Chapters 2 and 3 are important for teaching bachelor's and master's students how to conduct research in line with the principles and standards set out in this Code. However, as long as their research takes place within an educational context and does not result in research output other than a published thesis or similar final project, the procedures for alleged violations of research integrity as described in Chapter 5 do not apply to students' research.[5]

The duties of care set out in Chapter 4 are primarily intended for the institutions themselves and the board members, directors, managers, principal investigators, and supervisors working there. It is their responsibility to ensure a working environment in which integrity in research practices is promoted, safeguarded, and protected.

1.5 Relationship with other regulations

This Code lays out general principles and standards that hold for all disciplines, types of research, and institutions that adopt it. This means that, in certain cases, these principles and standards can be supplemented or specified in more detail. Any such change requires reflection and discussion and may not result in principles or standards being weakened.

5 Student research is, however, subject to other rules and regulations, such as their university's Fraud and Plagiarism Policy and/or their degree programme's Education and Examination Regulations (OER).

This Code takes effect on 1 January 2027.

Researchers may be subject to other regulations and guidelines alongside this Code of Conduct, for example within the context of a professional practice. In addition, there may be (statutory) rules in domains that border on or overlap with that of research integrity.[6] If a researcher fails to comply with such a rule or guideline, this may also lead to non-compliance with this Code. Where the application of this Code conflicts with statutory law, statutory law prevails.

Like the NGWI 2018, the NGWI 2027 respects the framework of the *European Code of Conduct for Research Integrity*, drawn up by the European Federation of Academies of Sciences and Humanities ALLEA (All European Academies). As a national code, the NGWI 2027 is more specific than the ALLEA 2023 Code on certain points.[7] For example, it has a separate chapter on institutional duties of care and outlines the procedure for complaints about alleged research integrity violations in greater detail. In other respects, the NGWI 2027 is narrower in scope than the ALLEA 2023. One example is that the NGWI 2027 only addresses research integrity narrowly understood and does not cover related issues such as social safety and broader ethical considerations. Separate advisory reports, codes, and procedures regarding these issues have already been published or are under development in the Netherlands.

1.6 Effective date and transitional provisions

This Code takes effect on 1 January 2027. Chapters 2, 3, and 5 of the NGWI 2027 apply to research that starts after the effective date.

On that date, the NGWI 2018 is revoked, with the understanding that it remains applicable to research activities that have started before the NGWI 2027 takes effect.

If an institution adopts this Code after 1 January 2027, it comes into effect on a date to be determined by that institution.

An institution may stipulate in an action plan that one or more of the duties of care set out in Chapter 4 will take effect on a later date. The action plan will specify the later date. This date may vary from one duty of care to another.

6 See the appendix for examples of statutory rules, codes, and guidelines that overlap with or are adjacent to the NGWI 2027.

7 ALLEA. (2023). *The European Code of Conduct for Research Integrity – Revised Edition 2023*, p. 4.

2. Principles

The fundamental impetus of researchers is the quest for knowledge and understanding. This impetus can manifest itself in various ways and has been explained, for example, in terms of the pursuit of truth, methodological doubt, innovation, and critical theory.

The quest for knowledge and understanding motivates scientific and scholarly research in all its forms, whether this concerns fundamental, practice-oriented or applied research, and regardless of any more specific (societal) purpose that it serves.

The principles outlined below arise from the quest for knowledge and understanding in research. They offer guidance on integrity in research practices for individual researchers, research teams, and research institutions. The principles are also relevant for other parties that have an influence on the integrity of the research process, such as publishers, research funders, and commissioning parties.

Principles aid researchers, both individually and collectively, in exercising good judgement in a variety of circumstances. The principles are not absolute and may be at odds with one another. In order to apply them in a coherent manner to specific cases, they therefore require active engagement from researchers.

1. Honesty

Researchers work truthfully. This means, among other things, that they report the research process accurately, refrain from fabricating or falsifying data or sources, take alternative points of view and counterarguments seriously, are open about margins of uncertainty, and do not present results more favourably or unfavourably than they are. Researchers also acknowledge all those who contributed to the research and do not take credit for the work of others.

2. Scrupulousness

Researchers use scientific or scholarly methods and work with precision in designing, executing, reporting, and disseminating research. They always provide adequate justification for their research questions, choices, and results.

3. Independence

Researchers adopt an open and critical attitude, also towards themselves. They strive to be aware of their preferences, beliefs, and biases, and are prepared to account for them. Researchers safeguard their independence. In their research, they do not let themselves be guided by, for example, personal, political, or commercial interests, and resist any undue influence. Researchers must be able to trust that the institutions enable them to do so and protect academic freedom.

4. Transparency

Researchers make clear on which data and methods the research is based, how results were obtained, and what the role of (external) stakeholders has been. They design the research process in such a way that it can be followed (and possibly reproduced) and verified, at least by peers. If parts of the research or the data cannot be made accessible, researchers can provide an adequate justification for why this is so.

5. Responsibility

Researchers are part of society and take account of this. The research they conduct is of significance to science, scholarship, and society, be it directly, indirectly, or because it lays a foundation for potential breakthroughs in the future. Researchers respect the social and natural environment and the interests of persons and animals involved in the research.

3. Standards

3.1 Introduction

The principles discussed in Chapter 2 offer guidance on integrity in research practices. The standards in this chapter set out more concretely how researchers, individually and collectively, should conduct research with integrity.

The standards are formulated in general terms. They can be specified or supplemented for different types of research, disciplines or institutions. Any such change requires reflection and discussion and may not result in standards being weakened. In interpreting, weighing, and applying the standards, the differences between fundamental, applied, and practice-oriented research may be important.

This chapter begins with standards that apply to all phases of the research process. The standards are then grouped by research phase, i.e., design, execution, reporting, assessment and peer review, and communication.

It is the responsibility of researchers, both individually and collectively, to adhere to these standards. At the same time, the institutions they are affiliated with are responsible for creating a working environment that stimulates and safeguards integrity in research practices. This institutional responsibility is the topic of Chapter 4. Chapter 5 addresses when conduct that goes against standards may give rise to formal complaints about alleged violations of research integrity.

3.2 Standards pertaining to all research phases

1. Comply with relevant national and international statutory frameworks and regulations.[8]
2. Keep your expertise up to date and only take on tasks that fall within your area of expertise or for which you can develop the required expertise within the available time.
3. Always adhere to this Code in your research, also in collaborations with commissioning parties or research partners who are not affiliated with an institution that has adopted this or a similar code.
4. Be open about any potential conflicts of interest and relevant ancillary activities, and ensure that these do not undermine your ability to work according to the principles and standards of this Code. Also be open about the role of commissioning parties and collaborating partners.
5. Follow the principles of Open Science (such as open data, open source, open access, and reproducibility), unless there are valid reasons not to do so.[9]
6. Make data Findable, Accessible, Interoperable and Reusable in accordance with the FAIR principles, unless there are valid reasons not to do so.[10]
7. Ensure that sources are verifiable.
8. Ensure that the use of technologies in your research aligns with the principles and standards set out in this Code.
9. Do not hinder the work of other researchers in an inappropriate manner.
10. Do not encourage researchers to deviate from the principles and standards set out in this Code, particularly if you are in a position of authority, such as board member, director, manager, principal investigator, or supervisor.
11. Help foster a culture in which research integrity is a topic of conversation, particularly if you are in a position of authority. Encourage open discussion of any questions or concerns regarding adherence to the principles and standards set out in this Code.
12. Do not accuse other researchers of violating research integrity if you know, or should have known, that your accusation lacks justification.

8 See the appendix for examples of statutory rules, codes, and guidelines that overlap with or are adjacent to the NGWI 2027.

9 Valid reasons – including national security, confidentiality, intellectual property rights, privacy, and respect for those involved in the research – can be found in UNESCO. (2021). *UNESCO Recommendation on Open Science*. The general principle of Open Science is that research should be as open as possible and as closed as necessary (see also UNESCO. (2022). *An introduction to the UNESCO Recommendation on Open Science*).

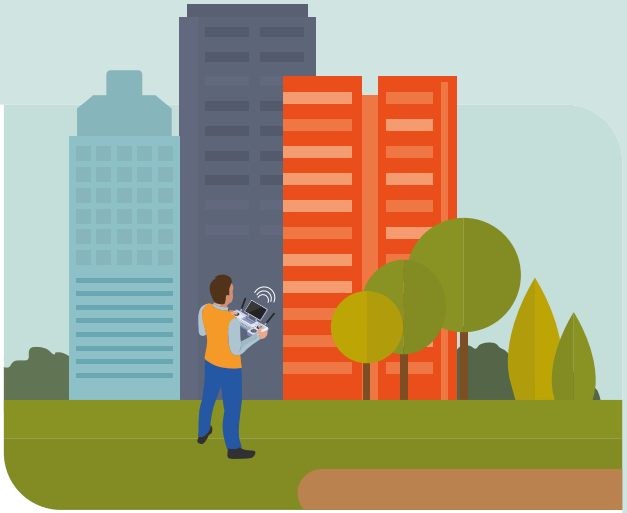
10 See the GoFair website.

3.3 Design

13. Justify how you arrived at the research question and take the latest scientific or scholarly insights into account.
14. Support any statements regarding expected research results properly.
15. Ensure a carefully supported methodological design that is appropriate for the research question.
16. If you wish to conduct research for which ethical review is (legally) required, ensure that this review takes place in advance and proceed with the research only after obtaining the necessary permission.
17. With a view to verifiability and reusability, describe how research data, research software, and/or other research materials will be managed before, during, and after the study, for example in the form of a data and/or software management plan.
18. In research collaborations with external partners, make explicit agreements on matters relating to research integrity, in particular independence, and record these in writing.

3.4 Execution

19. Use methods that are appropriate and can be followed (and possibly repeated).
20. Do not make up data or research results, and do not report fabricated data or research results as if they were real.
21. Do not falsify data or research results. Do not manipulate research materials, equipment, or processes in order to modify, withhold, or delete data or research results.
22. Base decisions concerning research methods, technologies, data analysis, argumentation, assessment of the results, or weighing of possible explanations primarily on research-related considerations (and not, for example, on personal, political, commercial, or other improper considerations).
23. Do justice to all obtained data or research results.
24. Carefully document and manage the data collected and/or used, as well as the relevant software. Retain both raw and processed data for a period of time that is appropriate for the discipline and methodology, where applicable in accordance with the data management plan or justifiable deviations from it.



3.5 Reporting and publication

25. Be transparent about the methods and procedures followed, as well as the technologies used. Document these where relevant (for example in research protocols, logs, lab journals, or reports). Describe the various steps of the research process clearly so that the research is verifiable. Where appropriate, ensure that the research is replicable and the data analysis reproducible.
26. Support your conclusions and make clear where there are uncertainties or indications that run counter to the conclusions, such as unreported data collected during the research that could lead to different conclusions.
27. Be clear about the results and conclusions, as well as their scope.

28. Do not present other people's ideas, methods, data, results, images, or texts as your own work, and make sure to properly cite the source or provide other appropriate acknowledgement.[11]
29. Present other people's ideas, methods, data, results, images, or texts accurately.
30. Give appropriate acknowledgement to everyone who contributed to the research.
31. Only list as authors those who have made a substantial intellectual contribution to the research, as described, for example, in the Contributor Role Taxonomy (CRediT)[12] or a similar taxonomy.
32. Make timely agreements about the allocation and order of authorship. In doing so, follow the prevailing standards in the relevant discipline(s).
33. As a guiding principle, all authors should have approved the final version of the research product.
34. Choose your academic publication channels carefully (such as journals, conference proceedings, books, and repositories). Avoid publication channels that conflict with the principles and standards set out in this Code, for example because of inadequate assessment procedures.[13]

11 See, for example, KNAW. (2014). *Correct citeren. Briefadvies*.

12 See https://credit.niso.org.

13 One tool that may help in this respect is the website https://thinkchecksubmit.org/.

3.6 Assessment and peer review

35. Assess research products (such as manuscripts, project proposals, dissertations, and protocols) only if there can be no reasonable doubt about your independence.[14]
36. Do not cooperate as founder, editor, or peer reviewer with academic publication channels that conflict with the principles and standards set out in this Code.
37. As an assessor, peer reviewer, and editor, be honest and scrupulous and provide the reasons for your assessment. Retain final responsibility for the content of the review. Request permission if you wish to undertake an assessment or peer review jointly with others. Do not abuse your role to inflate your own or others' citation scores.
38. Do not use information meant for an assessment or peer review for any other purpose, and do not share this information with others – including through software or other indirect methods – unless you have explicit permission to do so.
39. Cooperate with internal and external assessments of your own research.

14 Institutions or funding bodies may have more specific guidelines for e.g. avoiding conflicts of interest and disclosing interests. Requirements pertaining to the independence of members of PhD examining committees are laid down in the universities' PhD regulations.

3.7 Communication

40. In public communication, be open about the scope of the research, your own expertise and possible uncertainties regarding the results.
41. If you engage in public debate, clearly indicate to what extent you do so based on professional expertise and to what extent you do so in a personal capacity.

4. Duties of care of institutions

4.1 Introduction

Research integrity is a responsibility shared by researchers and the institutions with which they are affiliated. Researchers are responsible for conducting research in accordance with the principles and standards set out in Chapters 2 and 3. Institutions are responsible for creating a working environment that encourages and safeguards this.

To this end, institutions have duties of care. These duties of care concern the embedding of research integrity in the organisation and in policy. They are therefore addressed primarily to board members and others with an institutional responsibility for research integrity, such as directors, managers, principal investigators, and supervisors.

The basis of research integrity lies in a healthy research culture in day-to-day practice. After all, applying the principles and standards set out in this Code requires an environment in which it is common to discuss them and, where necessary, to further adapt research activities accordingly. This chapter first outlines the key elements of a healthy research culture before describing the specific duties of care that this entails for board members and others with institutional responsibility for research integrity.

4.2 A healthy research culture

A healthy research culture is one in which staff members learn about the principles and standards of research integrity from the outset, and in which research integrity remains a point of attention throughout their careers. Researchers work in a safe, inclusive, and open environment in which they feel responsible, accountable, and supported. They can ask questions, share dilemmas, and discuss mistakes without fearing repercussions.

In such a culture, research integrity is regarded not only as an individual task, but also as a collective one. The institutional responsibilities for research integrity have been explicitly assigned at all relevant levels of the organisation, with sufficient time and resources being allocated to meet them. Researchers regularly discuss research integrity with one another. In doing so, they also consider the impact that separate decisions concerning research have on the research integrity of their organisational unit as a whole. Examples include decisions regarding partnerships, research topics, methods, and funding. These discussions about collective responsibility for research integrity are conducted with respect for individual academic freedom.

A healthy research culture is also one in which people are aware of risk factors and take steps to address them wherever possible. Integrity in research practices is furthermore safeguarded by careful and fair procedures for complaints regarding alleged violations of research integrity.

If standards are found to have been violated, an appropriate response follows. Lessons are drawn from research integrity cases to improve both day-to-day research practices and the procedures followed.

4.3 Duties of care

The duties of care listed below concern, in order: promoting a culture of research integrity through **leadership and vision**; **developing and embedding policy** on research integrity within the research organisation and the research process; raising awareness of integrity in research practices through **education, training, and discussion**; the **reporting structure and protection** in the event of alleged violations of research integrity; and the **accountability, monitoring, and evaluation** of the policy aimed at fostering a culture of research integrity.

4.3.1 Leadership and vision

1. As a board member, director, manager, principal investigator, or supervisor, actively promote the principles and standards set out in this Code and foster a culture of trust, openness, and accountability. As an institution, ensure that board members, directors, managers, principal investigators, and supervisors are supported in this, for example by providing training in research integrity leadership.
2. Embed research integrity in the vision, strategy, and policy of the organisation, as well as in the practice of research.

3. Safeguard academic freedom and protect researchers from undue pressure and interference, whether from within or outside the institution.

4.3.2 Policy and organisational embedding

Policy in general

4. Ensure the availability of clear and easily accessible instructions, protocols, or other resources that support researchers and help them understand what constitutes integrity in research practices in their discipline(s) and institution.
5. Draw up guidelines, preferably at a cross-institutional level, for research integrity in the use of digital technologies, including those referred to by the abbreviation 'AI'. Explain in these guidelines which technologies, or which uses of certain technologies, do and do not align with the principles and standards set out in this Code. Update these guidelines as required by new developments.

Ethical review

6. Ensure that proposed research projects can undergo ethical review by establishing and supporting one or more ethical review committees. Such committees can advise researchers and board members on such matters as potential conflicts of interest; the disclosure of data; the use of technologies in research processes; the involvement and treatment of research participants (e.g. patients, human subjects, and laboratory animals); the use of human tissue; and potential risks to the natural and social environment.

Data and software management

7. Ensure the availability of an infrastructure where data, software, and research materials are stored as durably and transparently as possible, are secured adequately, and remain accessible in accordance with discipline-specific standards, so that the research is verifiable.
8. Ensure that data, software, and research materials are as open and accessible as possible in accordance with the FAIR principles. Make procedures for accessing data, software, and research materials transparent and easy to understand for those involved.

Interests

9. Set up a transparent system for registering and disclosing ancillary activities and positions.[15] Be transparent about the external funding of professorships, including those at universities of applied sciences, and of research infrastructure.[16]
10. If there is a potential conflict of interest, consult with the other party or employer, where relevant. Stipulate in (partnership) agreements with external parties that the research is to be carried out in accordance with the principles and standards set out in this Code.

Communication, publication, and disclosure

11. Practise research integrity in the institution's own communications with a wider audience, for example by communicating honestly and scrupulously about research results.
12. Promote awareness among researchers about the difference between participating in the public debate in a professional capacity and participating in a personal capacity.
13. Before the start of the research, ensure that contracts with commissioning parties and funding bodies clearly state whether or not data and research materials will be made public and accessible. In doing so, apply the Open Science and FAIR data principles, unless there are valid reasons not to.
14. Develop a policy regarding the process of retracting publications and make it easily accessible both internally and externally, so that swift and appropriate action can be taken once it has been conclusively determined that retraction is necessary.

15 See for example https://www.universiteitenvannederland.nl/onderwerpen/personeel/overzicht-registratie-nevenwerkzaamheden-hoogleraren-nederlandse.

16 See for example https://www.universiteitenvannederland.nl/onderwerpen/personeel/overzicht-extern-gefinancierde-leerstoelen.

4.3.3 Education, training, and discussion

15. Build awareness of research integrity among all relevant staff members throughout their careers. Provide information and training to both new research staff and established researchers.
16. Embed attention to research integrity in relevant education and training programmes.
17. Ensure that junior researchers and PhD candidates are supervised by qualified researchers who also have enough time for this.
18. Organise regular meetings to discuss research integrity at all relevant levels of the organisation, for example to talk about doubts and dilemmas. Also use these meetings to examine the impact of separate research decisions on the research integrity of the research unit or the organisation as a whole.

4.3.4 Reporting structure and protection

19. Ensure the appointment, training, and support of independent confidential counsellors who are easy to reach and function as accessible first points of contact in matters related to research integrity. Also make sure that it is clear what employees can approach these confidential counsellors for, for example to discuss questions and concerns about research integrity and for advice about the complaints procedure.
20. Establish a procedure and a committee for handling complaints as described in Chapter 5 (see section 5.3). Furnish the committee with adequate support and legal expertise.
21. During the procedure, act as a responsible employer towards both the respondent and the complainant (where the latter is also an employee) and be mindful of their interests, regardless of the outcome of the procedure.
22. Develop a clearly defined sanctions policy, preferably at a cross-institutional level, to prevent unequal treatment and arbitrariness.

4.3.5 Accountability, monitoring, and evaluation

23. Make reflection on research integrity a standard part of the evaluation of research units, organisational divisions, and the institution as a whole.
24. In the annual report, explain how the duties of care have been fulfilled. Describe how the institution actively promotes a healthy research culture. Do not only discuss (the handling of) reports and complaints, but also explain how the organisation structures the process of learning from them.
25. Contribute to making case law on research integrity accessible.
26. Make research integrity a topic of discussion with the supervisory body.
27. Ensure that confidential counsellors and any other research integrity officials engage in regular dialogue with board members, for example through annual meetings.
28. Review and update the research integrity policy on a regular basis across all relevant organisational units.

5. Violations of research integrity

5.1 Introduction

Researchers, supervisors, principal investigators, managers, directors, and board members of the institution bear both individual and collective responsibility for ensuring that research is conducted in accordance with the principles and standards set out in this Code of Conduct. Non-observance of the Code of Conduct compromises the research process, the relationship between researchers, and, potentially, the credibility of the research.

This is all the more true for the most serious forms of non-observance: violations of research integrity (described in more detail below). Such violations erode the trust that researchers may have in one another and that society may have in science and scholarship. They put the legitimacy of research at stake.

Hence, there should be procedures for reporting alleged violations of research integrity, as well as mechanisms for sanctioning proven violations. This chapter offers guidance to board members, researchers, and other relevant parties on handling concrete suspicions of research integrity violations. Section 5.2 describes when research integrity may have been violated, including the weighting criteria to be used for assessing this. Section 5.3 outlines the procedure to be followed in cases of alleged research integrity violations. Section 5.4 deals with sanctions or measures that can be taken, if necessary.

5.2 Description violation of research integrity

In certain cases, non-observance of this Code is so serious that it constitutes a violation of research integrity; by the researcher and, insofar as applicable, by the director, manager, principal investigator, or supervisor who incited the non-observance.

1. The most obvious examples of research integrity violations are fabrication, falsification, and plagiarism:
   - fabrication is making up data or research results, or reporting fabricated data or research results as if they were real (see standard 20);
   - falsification is deleting, withholding, or modifying data or research results, or manipulating research materials, equipment, or processes without explicit justification (see standard 21); and
   - plagiarism is presenting someone else's ideas, methods, data, results, images, or texts as one's own work without properly citing the source or providing other appropriate acknowledgement (see standard 28).

2. For some standards, whether non-observance of them warrants the classification 'violation of research integrity' depends on the outcome of an assessment based on the weighting criteria described below. Examples include standards 4 (*conflicts of interest*), 7 (*verifiability of sources*), 10 (*encouraging deviation from the code*), 16 (*required ethical review*), 22 (*primacy of research-related considerations*), 24 (*documenting data and software*), 31 and 32 (*taxonomy and order of authorship*), 35 (*independence in assessment*) and 38 (*improper use of assessment information*).

3. Sometimes complaints are submitted in bad faith, with the main intention of tarnishing a researcher's reputation or career. Submitting an official complaint regarding alleged violations of research integrity while one knows, or should have known, that the accusation lacks justification, constitutes a violation of research integrity (see also standard 12).

4. For the non-observance of standards other than those listed under 1, 2, and 3 above, application of the weighting criteria will lead to the classification 'research integrity violation' only in exceptional cases.

The right to submit a complaint as provided for in this chapter does not extend to the duties of care set out in Chapter 4. Bodies such as the Supervisory Board and/or participatory bodies may, of course, pay attention to the institution's fulfilment of its duties of care.

Weighting criteria

Whether certain conduct actually constitutes a violation of research integrity depends on the specific circumstances of the case. In the assessment conducted by the executive board of an institution or a research integrity committee (*Commissie Wetenschappelijke Integriteit* (CWI) or, for some institutions, a research integrity officer), the following criteria are of particular (though not exclusive) importance:

- the seriousness and extent of the non-observance;
- the degree to which non-observance was blameworthy;
- the views and practices within the research field at the time of the conduct in question, for example the qualification of the type of publication, the standard pre-publication (review) processes, and the citation culture;
- possible consequences for:
  1. the validity of the research in question and for the state of science and scholarship;
  2. trust in research and between researchers;
  3. individuals (human and animal), society, or the environment;
- the researcher's position and experience;
- whether the researcher has repeatedly – or systematically – fallen short;
- any potential (financial) benefits for the researcher or other stakeholders (such as a commissioning party in the case of contract research);
- the role of the institution – for example the role of board members, directors, managers, principal investigators, or supervisors – and whether it fell short in performing its duties of care; and
- the time that elapsed before action was taken to address the non-observance, whether from within the institution or by an external party.

Numerous advisory opinions are now available in which institutional research integrity committees or the LOWI (*Landelijk Orgaan Wetenschappelijke Integriteit*; the Netherlands' national research integrity body) have assessed complaints based on weighting criteria.[17]

Lighter classifications

In some instances, non-observance of one or more of the standards set out in Chapter 3 may not be severe enough to warrant the classification 'violation of research integrity'. In such cases, the non-observance may be classified as 'questionable conduct' or, in even milder cases, as a 'minor shortcoming', depending on the outcome of the assessment by means of the weighting criteria.

In the case of these lighter classifications, the institution can take appropriate measures as referred to in section 5.4. Its research integrity committee (CWI) can advise the institution in such an event.[18]

17 See https://www.universiteitenvannederland.nl/publicaties-klachten-wetenschappelijke-integriteit and https://lowi.nl/adviezen/.

18 Legal sanctions, such as those referred to in section 5.4, are relevant when an alleged research integrity violation has been proven. Respondents have generally not defended themselves against allegations of a 'minor shortcoming' or 'questionable conduct'. After all, the complaint against which they must defend themselves can only pertain to the most serious form of non-observance: a possible violation of research integrity.

5.3 The complaints procedure

The institution ensures a careful and fair procedure (and subsequent decision-making) for handling complaints regarding alleged violations of research integrity. The purpose of the procedure is to determine whether a violation of research integrity has indeed occurred and, if so, to address it. Complaints can have a significant impact on both the complainant and the respondent, particularly when the complainant is in a position of dependence on the respondent. For the respondent, a complaint that is proven to be valid may ultimately be grounds for dismissal. Even if a complaint turns out to be unfounded, however, damage to the respondent's reputation may be severe. The procedure must therefore include appropriate safeguards.

Anyone who suspects that research integrity has been violated may submit a complaint to the research integrity committee (CWI, or, where relevant, the research integrity officer) that is designated by the institution for this purpose. Following its investigation, the committee issues an advisory opinion on the complaint to the institution's executive board. The executive board then decides how to deal with the case. The same procedure applies if the executive board launches an investigation into an alleged violation of research integrity without receiving a formal complaint.

Basic principles
The following basic principles apply to the handling and decision-making process.

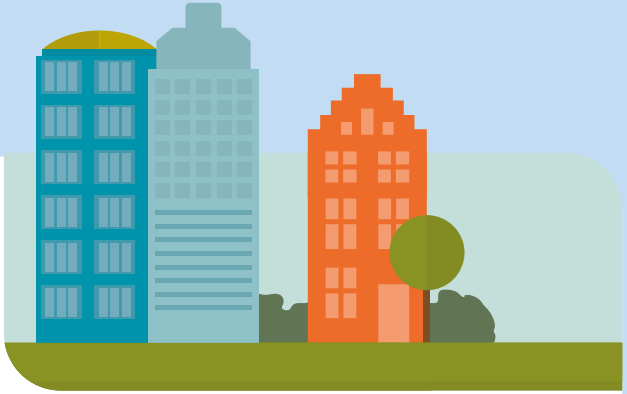
Committee

1. The research integrity committee (CWI, henceforth referred to as 'the committee') is tasked with investigating complaints and advising the executive board on the merits of the complaint. In addition, the committee can offer advice to the institution's executive board, whether or not at its request, on matters of research integrity (see section 5.4). The institution furnishes the committee with adequate support and legal expertise.

Complaint

2. A complaint, or a request for an advisory opinion, regarding an alleged research integrity violation by an employee[19] may be submitted by:
   - any person;[20]
   - the executive board of the institution.

   The complaint must provide sufficient grounds for why the complainant believes research integrity to have been violated.



3. A complaint may only be submitted about an alleged research integrity violation committed by a current or former employee of the institution, or by someone who works or has worked under the institution's responsibility.[21] The Code does not provide a standard procedure for complaints regarding research integrity made against individuals who are not researchers, against entities such as journals, or against (the executive board members of) institutions based on the duties of care set out in Chapter 4.

4. An anonymous complaint regarding an alleged violation of research integrity will not, as a rule, be processed. The institution's executive board may waive this rule only if it is of the opinion that:
   - there are compelling public interests, institutional interests, or interests of the respondent to do so; and
   - the fact-finding investigation can be carried out without the complainant's involvement.

19 'Employee' includes anyone who no longer works at or for the institution but who, under the Collective Labour Agreement, is (or was) employed by the institution or is (or was) otherwise engaged in work under the institution's responsibility.

20 This includes a researcher who wants to have their own conduct reviewed, for example in response to allegations in the media, where the institution's executive board has remained inactive and no official complaint has been submitted regarding an alleged violation of research integrity.

21 Other arrangements may apply for institutions belonging to the TO2 Federation, given their specific public remit.

Admissibility

5. The committee may refrain from processing or further processing a complaint once it becomes clear that:
   - the complaint exclusively concerns a professional, scientific or scholarly difference of opinion (for example methodological discussions or regular academic debate);
   - the complaint exclusively concerns another conflict (for example a labour conflict);
   - the complaint exclusively concerns another form of inappropriate conduct, for example relating to social unsafety, however closely this conduct may be associated with research integrity (a complaint regarding that particular aspect may, of course, be submitted);[22]
   - the complaint is essentially a civil law dispute (including a dispute about intellectual property rights);
   - the complaint cannot lead to the conclusion that the respondent's conduct constitutes a research integrity violation;
   - the complaint is evidently of insufficient importance;
   - the complaint concerns conduct that took place too long ago in the committee's view;
   - the complainant waited an unreasonably long time before submitting the complaint;
   - the complainant has compromised the confidentiality of the procedure; or
   - the complaint has been investigated previously by the same or a similar committee.

Investigation

6. The investigation procedure must be conducted fairly. To guarantee fair proceedings, the procedure must:
   - ensure fair treatment, including the presumption of innocence, the hearing of both sides, and the provision of all relevant information to the complainant and the respondent;
   - be confidential;
   - be set up in such a way that neither the complainant nor the respondent suffers any undue disadvantage in their career prospects or otherwise;
   - be concluded within a reasonable period of time;
   - be conducted by experts who have no stake in the matter and have sufficient distance from it;
   - be laid down by the institution in a clear regulation that is easy to find; and
   - provide for the possibility of seeking an independent second opinion (for example, from the LOWI if the institution is affiliated with it) before the institution takes a final decision.

7. The procedure includes, if relevant to the institution, provisions as to when, and under what conditions, the undisclosed components of the research or data will be made available for verification as part of the investigation. Such provisions will at least state which persons or officers are authorised to carry out verification checks, how they should be carried out, and how the findings are to be reported. The procedure may include provisions stating that, in highly exceptional cases, there may be compelling reasons for components of the research, including data, not to be disclosed to a confidential investigation into an alleged violation of research integrity. Such cases must be recorded and the consent of the executive board of the institution must be obtained prior to using the components and/or data in question in the research. They must also be mentioned in any results that are made public.

8. The committee may decide, by way of exception, to withhold information from the complainant and/or respondent if there are compelling reasons for doing so.

22 Other regulations may be in place for other forms of inappropriate behaviour.

Decision-making of the institution

9. The committee assesses whether research integrity has been violated and explains its findings in an advisory opinion issued to the executive board. Following receipt of the committee's advisory opinion, the executive board of the institution makes a preliminary decision and immediately notifies the complainant and the respondent of this in writing. The complainant and the respondent may request an independent second opinion about the institution's preliminary decision (for example, from the LOWI if the institution is affiliated with it). If neither party seeks an independent second opinion, the executive board of the institution takes its final decision. If a second opinion has been requested, the executive board will take this opinion into account in reaching its final decision.
   If the executive board finds that research integrity has been violated, it must simultaneously decide on any sanctions or measures as referred to in section 5.4. The institution then ensures that the findings and final decision are made public in anonymised form.

10. The executive board of the institution ensures that the rights of both the complainant and the respondent are protected, and that neither suffers any undue disadvantage in their career prospects or otherwise. The executive board of the institution is not obliged to cover the costs of legal assistance, but may decide to do so.[23]

23 It may, for example, be reasonable to do so when the institution itself submits a complaint against (or seeks advice regarding) one of its current or former employees.

No other procedure
The institution ensures that its constituent units, for example a university medical centre, faculty, or research group, do not follow any procedure other than the standard procedure for assessing whether research integrity has been violated.

5.4 Sanctions, measures, and signalling

Once the investigation into an alleged violation of research integrity has been completed, the question is whether legal sanctions or other measures should be imposed.

Legal sanctions
If research integrity has been violated, the executive board of the institution considers whether it is possible and desirable to impose legal sanctions. The institution has the authority to impose legal sanctions, for example an official warning, a reprimand, reassignment, demotion, or dismissal. It may also suspend the right to act as promotor (*ius promovendi*). A legal sanction must always be appropriate and proportionate.

It is not the task of the committee to advise on legal sanctions.

Measures
The executive board may also decide to impose corrective measures on the respondent in order to mitigate the impact of the established violation. Examples include retracting a publication (or submitting a request to do so), correcting the cited sources, or disclosing a conflict of interest. Such measures are expressly distinct from legal sanctions.

The executive board can – even if the complaint ultimately proves to be unfounded – examine whether appropriate (remedial) measures are required, for example in view of strained relationships within the organisational unit where the respondent works.

Regardless of whether a violation of research integrity has been proven, there may be a need to address – occasional, repeated, or systematic – non-observance of standards. The committee can advise the executive board on this.

Any measures that have been imposed before the executive board of the institution has taken its final decision are provisional in nature.

Continuous attention and signalling
As discussed in Chapter 4, research institutions are responsible for creating a working environment that encourages and safeguards adherence to this Code. The committee has the authority to give advice to the executive board of the institution, whether or not at its request, on policies for promoting research integrity, for example in response to signals arising from specific cases.

Appendix: Examples of related laws, codes, and guidelines

This appendix lists examples of statutory rules, codes, and guidelines that overlap with or are adjacent to the *Netherlands Code of Conduct for Research Integrity 2027*. The list below is not exhaustive and examples may not always be applicable in every case.

- General Data Protection Regulation
- Data Protection Omnibus Act (Verzamelwet gegevensbescherming)
- Public Records Act 1995 (Archiefwet 1995)
- Code of Ethics for research in the Social and Behavioural Sciences involving human participants
- Databases Act (Databankenwet)
- Code of Conduct for Health Research
- Embryo Act (Embryowet)
- Foetal Tissue Act (Wet foetaal weefsel)
- Medical Research (Human Subjects) Act (Wet medisch-wetenschappelijk onderzoek met mensen)
- Medical Treatment Contracts Act (Wet op de geneeskundige behandelingsovereenkomst)
- Medical Devices Act (Wet medische hulpmiddelen)
- Population Screening Act (Wet op het bevolkingsonderzoek)
- Genetically Modified Organisms Decree (Besluit genetisch gemodificeerde organismen)
- Genetically Modified Organisms Regulation (Regeling genetisch gemodificeerde organismen)
- Directive on the protection of animals used for scientific purposes
- Experiments on Animals Act (Wet op de dierproeven)
- Radiation Protection Decree (Besluit basisveiligheidsnormen stralingsbescherming)
- Environmental Management Act (Wet milieubeheer)
- Sectoral Scheme on Ancillary Activities for Dutch Universities
- UNESCO Recommendation on Science and Scientific Researchers
- Whistleblowers Protection Act (Wet bescherming klokkenluiders)
- Copyright Act (Auteurswet)
- Patents Act 1995 (Rijksoctrooiwet 1995)
- Neighbouring Rights Act (Wet op de naburige rechten)
- Seeds and Plant Materials Act 2005 (Zaaizaad- en plantgoedwet 2005)
- General Security Requirements for Central Government Contracts 2026 (ABRO)
- Civil Service Information Security (Classified Information) Decree 2025 (Besluit voorschrift informatiebeveiliging rijksdienst bijzondere informatie 2025)
- Judicial Data and Criminal Records Act (Wet justitiële en strafvorderlijke gegevens)
- Police Data Act (Wet politiegegevens)
- Intelligence and Security Services Act 2017 (Wet op de inlichtingen- en veiligheidsdiensten 2017)
- Security Screening Act (Wet veiligheidsonderzoeken)
- National knowledge security guidelines 2026
- EU Artificial Intelligence Act

Colophon

Drafting committee for the further development of
the Netherlands Code of Conduct for Research Integrity:

- prof. dr. ir. Jeroen de Ridder (chair)
- dr. Sophie Boerman
- Marc de Droog MSc
- prof. dr. Marijtje van Duijn
- prof. dr. Aad van der Lugt
- prof. dr. Iris van Rooij
- prof. dr. mr. Jonathan Soeharno
- mr. dr. Welmoed van der Velde

Advice and support – Royal Netherlands Academy
of Arts and Sciences (KNAW):

- dr. Chantal Bax (secretary)
- ir. Arie Korbijn

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The Dutch version is available via the same link.

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