



K O N I N K L I J K E N E D E R L A N D S E
A K A D E M I E V A N W E T E N S C H A P P E N

**ROYAL NETHERLANDS ACADEMY OF ARTS AND SCIENCES
INTEGRITY POLICY OVERVIEW 2019**

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1. Introduction

The purpose of the Academy's Integrity Policy Overview is to provide a coherent picture of that policy. The overview deals with all aspects of integrity in the context of work. The basis for the Academy's integrity policy can be found in Article 1(2) of the Collective Labour Agreement for Dutch Universities (CAO NU).

The overview provides the framework for the Academy's integrity policy, which is based on the principle of "high trust, low tolerance". It aims to contribute to employees' integrity awareness and also facilitates access to a wide range of codes and regulations regarding integrity.

The Academy's integrity policy exists in order to help both present and future employees recognise risks, and it clarifies what is and is not permitted in certain situations. It goes without saying that the Integrity Policy Overview cannot anticipate every situation that might arise. Employees are expected to determine for themselves whether they are acting with integrity, doing so on the basis of the values of the Academy, their own judgement, and generally applicable standards. Transparency is of the essence in this respect, and it is important for employees – especially in cases of doubt – to continue to discuss the matter concerned with their superiors and colleagues.

An overview of all the applicable regulations, including the English translations, can be found on the [intranet](#).

1.1 The Academy's values

The Academy's Integrity Policy Overview derives not only from the scientific/scholarly responsibility that the Academy bears, but also from its social responsibility.

The Academy has as its core values *excellence, independence, authoritative, and inspiring*. It attaches particular importance to quality and scientific integrity, inclusiveness and diversity, and the responsibility that it has towards society.

1.2 Scope and extent

This Integrity Policy Overview applies to all persons employed by the Academy, including external staff. Every employee is expected to comply with the content of the overview and the Academy's regulations, codes of conduct, in-house rules, and instructions that it refers to. In the case of insourcing, procurement and tendering, it is important that the overview be brought to the attention of the external partner.

The overview supplements the existing regulations but does not replace them. It focuses primarily on behaviour and sets out the framework for integrity. It is an overarching document that refers to more detailed rules and regulations.



2. Good Employer and Employee Practice

Good employer and employee practice follow from Article 1.8 of the CAO NU. This provides that the employer is obliged to do, or refrain from doing, everything that a prudent employer ought to do or refrain from doing in similar circumstances (Article 1.8(1) CAO NU). For their part, the employee is obliged to perform their duties to the best of their ability, to behave as a good employee, and to act in accordance with the instructions given by or on behalf of the employer (Article 1.8(2) CAO NU).

2.1 Good employer practice

Like any other employer, the Academy has a duty of care towards its employees. Among other things, a good employer must behave properly towards its employees, respect their rights, and ensure a safe working environment. It is also the employer's duty of care to have a comprehensive integrity policy in place. The Academy must protect its employees against integrity risks by constructing the organisation and work processes accordingly (for example separation of duties), by taking the necessary measures (for example making a confidential counsellor available), and by drawing up rules for acting with integrity (for example the present overview). This also means that the Academy itself sets a good example as regards acting with integrity.

Creating a safe (working) environment for employees is an important responsibility on the part of the Academy so as to enable discussion of integrity issues within the organisation. This can also promote awareness of what constitutes integrity in behaviour.

2.2 Good employee practice

Employees are expected to act as befits a good employee. The Academy considers it important that its employees are reliable, service-oriented, independent, impartial, open, confidential, and careful.

The Integrity Policy Overview helps to clarify what constitutes behaving with integrity by providing a framework. In this way, it helps give substance to the concept of "good employee practice". Being a good employee means, for example, that the employee displays care and responsibility when dealing with resources, information, and powers. The public interest must be the guiding factor. Employees are expected to be able to resist temptation and to avoid risky situations. It is important that employees realise that private conduct – whether at work or not – which results in harm to the Academy can have an impact on their status as a good employee.

The values mentioned above provide general standards and guidance for the behaviour that can be expected of an employee. However, more specific standards and rules apply to certain matters. This is discussed in greater detail in the following sections.



3. Scientific Integrity

The Academy considers professional research behaviour and ethically responsible research to be of the utmost importance. The Academy is responsible for promoting and maintaining integrity among those involved. Here too, it applies the principle of “high trust – low tolerance”. The Academy strives for a workplace culture in which all employees are aware of the risks to integrity, discuss them with one another, and point them out to one another.

The Academy endorses the [Netherlands Code of Conduct for Research Integrity](#) drawn up by the Association of Universities in the Netherlands (VSNU). That code is based on five principles that form the basis for integrity in research, namely honesty, scrupulousness, transparency, independence, and responsibility. These principles act as a guide for *all* parties involved in the research concerned. They have been further elaborated in standards for good research practice. Failure to comply with those standards will lead to the imposition of measures and sanctions.

The Academy also has a duty of care to ensure that those involved can and will comply with the standards for good research practice. The Academy aims for a working environment that promotes and guarantees good research practices. The code sets out 21 duties of care intended to contribute to this. These duties concern training and supervision, the research culture, data management, publication and dissemination, and ethical standards and procedures.

Within the Academy, there is a central Scientific Integrity Counsellor available for questions and complaints regarding scientific integrity. He or she attempts to mediate or provides information about the options and procedure for submitting a complaint. The counsellor has an obligation of confidentiality. More information about the confidential counsellor is given in Section 7.2 of this overview. The Academy has a set of regulations (the [Scientific Integrity Complaint Procedure](#)) for reporting violations or suspected violations of scientific integrity. Those regulations apply not only to Academy employees but also to others parties with a complaint regarding a violation of scientific integrity by employees (and former employees) of the Academy. More information about the regulations is given in Section 7.1.



4. Risks to Integrity

4.1 Conflicts of interest

A conflict of interest can form a threat to integrity. A conflict of interest is as a situation in which an employee's private and professional interests are intertwined and conflict with one another. Private interests, financial or otherwise, may then have a negative impact on performance of the employee's duties and responsibilities at work. A distinction can be made between actual, apparent, and potential conflicts of interest.

In the event of a potential conflict of interest, the employee is expected to immediately report this to their manager so that they can discuss it. This allows the conflict of interest to be identified, dealt with, and resolved in good time.

The Academy recognises that employees have various interests and are in touch with the local, national, and international (research) community. The Academy assumes that these interests serve both the public interest and those of the Academy and the individual concerned. A degree of caution is required, however, because these contacts may lead to potential conflicts of interest.

Conflicts of interest are not just a risk faced by employees; they are also a risk where Academy boards, juries, and committee members are concerned. The various types of (potential) conflicts of interest and how the Academy deals with them when assessing nominations for prizes and memberships, applications for funding, and allocation of funding are described in its [Code of Conduct Governing Conflicts of Interest for Awards, Memberships and Funding](#).

4.2 Ancillary activities

Article 1.14 of the CAO-NU requires employees to notify their employer of any ancillary activities. The employee may perform such activities only with the approval of the employer. In order to make this more specific, the VSNU has drawn up [sectoral regulations on ancillary activities](#). These specify when ancillary activities must be reported and when approval must be granted for them.

The sectoral regulations define ancillary activities as all work and activities performed by a person outside the job and/or task assigned to him/her, regardless of the scope of their employment, the extent of the ancillary activities, whether the person receives remuneration for those activities, and whether the activities are performed during or outside working hours. Ancillary activities can therefore comprise a variety of different activities, meaning that performing them does not have to interfere with someone performing their duties for the Academy. The Academy is therefore basically in favour of ancillary activities, given that they contribute to the its employees' development. They must not of course impede academic independence and integrity in the performance of one's duties. It is therefore very important for the employee to be transparent about ancillary activities.

If the ancillary activities take place outside working hours, are not paid for, and do not impede the proper performance of one's duties, then they do not need to be reported. It must be clear that carrying out these activities cannot in any way harm the Academy or its interests. The employee must always report ancillary activities if they generate income. Responsibility for reporting lies with the employee.

4.3 Personal benefit

An Academy employee may find him/herself in a situation in which a business contact offers something, for example a gift, a gratuity, or an invitation. There are integrity risks associated with such a situation, for example conflicts of interest or being open to influence. The employee must be vigilant to ensure that their independence is guaranteed and that the appearance of a conflict of interest is avoided.



Article 1.15 of the CAO NU provides that in their capacity, the employee is not allowed to claim or request reimbursements, remuneration, donations, or promises from third parties. He/she is also prohibited from accepting reimbursements, remuneration or gratuities, unless the employer grants its approval.

In order to make this provision in the CAO NU more specific, the Academy has drawn up its [Rules Governing Acceptance of Gratuities, Gifts, and Invitations](#). If a gift or gratuity meets certain conditions, it can only be accepted if it represents a value of EUR 50 or less, and it must always be reported to the employee's manager. The manager must always be consulted in cases of doubt. Gifts or gratuities with a value of more than EUR 50 can only be accepted if the mandated person has given their consent for doing so. Similar conditions also apply to whether or not invitations can be accepted.

4.4 Procurement, tendering, and outsourcing

The procurement and ordering process is highly vulnerable to violation of integrity due to its financial aspect. Employees who are involved in procurement, tendering, and insourcing must always bear in mind that this means spending public money. Scrupulousness, efficiency, and independence are paramount. The conditions for competition must also be fair and honest.

Employees whose work involves procurement must act in accordance with EU directives, legislation and government regulations, and the Academy's *Procurement and Tendering Policy*. The latter includes ethical and idealistic principles in which a distinction is made between integrity and sustainable, socially responsible procurement. Integrity in the context of that policy is twofold. On the one hand, it concerns the fact that the Academy puts administrative and official integrity first. The Academy considers acting with integrity on the part of its employees to be of paramount importance. All Academy employees, including the Board of Management, are required to adhere to the codes of conduct that have been adopted, such as the [Code of Conduct Governing Conflicts of Interest for Awards, Memberships and Funding](#) and the [Code of Conduct on the Use of Personal Data in Scientific Research](#). Employees are required to act in a business-like and objective manner so that conflicts of interest are avoided. On the other hand, the Academy only concludes contracts with entrepreneurs that also act with integrity. When intending to award a contract, it can screen the relevant bidder prior to doing so. This only happens in cases of reasonable doubt or if there is a concrete reason for screening.

Employees whose work involves procurement, tendering, and insourcing must be familiar with the applicable rules. They must treat available information with care and must not make undue commitments or raise unjustified expectations when talking to potential suppliers.

4.5 Intellectual property

Pursuant to Article 3 of the Collective Labour Agreement for Dutch Universities, an employee has a duty to report if – during or in connection with the performance of their duties – he/she makes a potentially patentable invention or, as a result of breeding work, creates a variety for which breeders' rights may be acquired. The employee must report this in writing and submit information that will enable the employer to form an opinion about the nature of the invention or the variety. Furthermore, under the (Dutch) Patents Act [*Rijksoctrooiwet*], ownership of the invention is vested in the employer.



5. Dealing with Information, Facilities, and Resources

5.1 Confidentiality and confidential information

Academy employees have access to a great deal of information, but also often have to deal with confidential information and personal data (some of which may also be classed as “special” personal data). In accordance with Article 1.16 of the CAO NU, every employee is obliged to observe confidentiality with regard to information that comes to their knowledge as a result of their position. This obligation continues to apply after termination of their employment.

The employee must only use the information that is at their disposal for the purpose for which it has been provided. The information must only be shared with others on a need-to-know basis. The employee therefore has a responsibility to safeguard the confidentiality of the information. No confidential information may be disclosed. The employee must treat information with care and deny others access to it.

It is important for employees to continue to discuss the confidentiality of information with one another and with their manager, and that they are able to raise any concerns. All Academy employees must be aware that they work with confidential information and/or personal data, and of the risks that entails. Information and data carriers must be dealt with securely and protected to the maximum extent possible.

5.2 Protection of personal data and data leaks

The EU’s General Data Protection Regulation (GDPR) came into force on 25 May 2018. It applies throughout the EU and also applies outside the EU when personal data of a European person is processed. Under the GDPR, the protection afforded to the personal data of natural persons has been extended. Every employee is required to handle personal data with care. Personal data may only be used for the purpose for which it has been stored or processed.

Pursuant to the GDPR, data subjects whose personal data has been or is being processed have a number of rights, including the right to transfer personal data (data portability), the right of access, and the right to be forgotten (deletion of personal data). In this connection, the Academy has drawn up a Procedure for Dealing with the Rights of Data Subjects.

Employees must be aware that they are working with personal data and that they may not process or share it with third parties without consent or without a legal basis for doing so. An employee who receives a request from a third party to share personal data should preferably contact their manager and perhaps also the privacy coordinator. It goes without saying that no action may be taken that is contrary to the GDPR.

Employees must also be alert to data leaks and take action to prevent them. A data leak involves access to or the destruction, alteration, or release of personal data at the Academy without that being the intention. A data leak therefore also exists in the case of unlawful processing of personal data. A data leak occurs when there is a breach of the security of personal data. Examples include the loss of a USB stick with personal data, the theft of a laptop with personal data, or a hacked data file. The Academy is obliged to report data leaks to the (Dutch) Data Protection Authority [*Autoriteit Persoonsgegevens*] within 72 hours. In that context, the Academy has drawn up a [Procedure for Reporting Data Leaks](#). In the event of a data leak (or suspicion of such a leak), this must be reported immediately to the Academy’s Data Protection Officer, Overall Security Coordinator, Information Security Officer, or Legal Affairs Department. In the event of an ICT data leak, this should also be reported to the Computer Security Incident Response Team (CSIRT), so that the leak can be repaired as quickly as possible.

The Academy has appointed a Data Protection Officer who can be consulted for (independent) advice and information.



5.3 ICT, facilities, communication resources, and Internet use

Employees have access to the Academy's resources and facilities in order to perform their work. This may include (without this being an exhaustive list): a workstation, a computer/laptop, office supplies, laboratory supplies, printers, and an e-mail address. Employees are expected to handle the resources and facilities with care, responsibility, and respect. In that connection, they must also observe any conditions for use, security requirements, and contractual obligations and/or conditions. The resources and facilities must only be used for the purpose for which they were obtained. The employee must be aware that these facilities and resources have been financed with public money.

The Academy's [Code of Conduct for ICT Facilities and Communication Resources](#) sets out rules for the use of ICT facilities and communication resources. It applies to all persons to whom the Academy provides or makes available an ICT facility and/or communication resources. The code regulates responsible use and how any monitoring will take place. Rules have also been laid down regarding the circumstances under which the employer may gain access to the user's e-mail. The rules strike a balance between the responsible and secure use of ICT facilities, communication resources, and use of the Internet and users' privacy. The code also specifies what behaviour will in any case not be tolerated and what measures and/or sanctions may ensue. Unacceptable behaviour in any case includes (but is not limited to) viewing, downloading, and/or distributing discriminatory, racist, sexually charged, or insulting material.

The [Code of Conduct for ICT Facilities and Communication](#) also deals with the private use of facilities and resources and its admissibility.

Employees or users must report any misuse of facilities or resources that have been made available to him/her or if others exhibit unlawful behaviour in that regard. The user must in any case report any misuse of their own resources to their own manager. The confidential advisor may also be contacted in the event of unauthorised behaviour by colleagues.

It is not possible to establish fully in advance when there is a case of abuse. Employees are expected to take responsibility themselves in this regard and to decide for themselves whether there is an abuse. If in doubt, or if the case is unclear, the employee should contact their manager to discuss what is permissible.

5.4 Expense claims

Employees can claim expenses incurred in performance of their duties or for work, for example for business trips, moving house, and meals. The basic principle is that the costs must be understandable and transparent. Employees must enclose the relevant receipts or invoices when submitting their claim for costs. The Academy's [Expenses Instructions for staff](#) apply.



6. Interpersonal Behaviour and Working Climate

6.1 Respect and desirable/undesirable interpersonal behaviour

The Academy endorses the VSNU's statement on [Social safety at our universities: ensuring a safe, open and respectful sector](#), with the Academy and the sector aiming for a safe environment for employees and visitors. Good relations between colleagues, integrity, equality, respect, openness, and attention to one another are of paramount importance. Within the Academy we treat one another with respect, and mutual trust and acceptance are highly important. The Academy expects everyone to treat each other with respect, take account of and listen to one another, and respect differences in religious beliefs, gender, sexual orientation, disability, and ethnic or national origin. Such desirable interpersonal behaviour has a positive impact on cooperation and job satisfaction.

Within the Academy, the Academy's [Regulations on Desirable/Undesirable Interpersonal Behaviour](#) apply. Employees are expected to refrain from any kind of undesirable behaviour, such as intimidation, sexual harassment, aggression, violence, bullying, or discrimination.

6.2 Desirable working climate

The Academy aims to ensure that there is a good "working climate". In accordance with the VSNU's statement on [Social safety at our universities: ensuring a safe, open and respectful sector](#), the Academy is responsible for a positive working climate in which everyone can develop their talents. Everyone within the Academy contributes to creating that working climate, as a colleague and as a manager. In that context, the Academy draws attention to relevant matters within the work environment. The results of the periodic employee survey also generate important input for this, and action resulting from that survey often also contributes to ensuring a desirable working climate. That climate has a number of aspects.

Arranging, addressing, appreciating, and incorporating everyone's contribution to strategic ambitions

Employees are recommended to make arrangements with their manager as to how they will contribute to achieving the strategic aims, and be sufficiently challenged in that respect. The extent to which that is necessary will vary depending on the employee and their position. In addition, managers and employees together define a shared picture of, and agree on, the employee's area of responsibility, what the employee can influence within their role (empowerment), and when it is obvious that something should be assigned to a different person. Managers and research coordinators must ensure that it is clear who has what role and regarding what matters. Within the Academy, the contributions of researchers and support staff are valued equally.

Listening and speaking out

Both managers and employees must listen to and speak out to one another in a respectful manner so that any underlying issues are also addressed.

Benefiting from differences

At the Academy, dissenting opinions are heard, valued, and assessed. The Academy believes that colleagues can benefit from one another's differences, and by working with people who have different qualities or communication styles can achieve better results faster and more enjoyably.

Learning

The Academy notes that everyone makes mistakes, and that it is wise to be open towards one another about this, and to acknowledge shortcomings and learn from them. Asking questions is appreciated, and the consultation structure has also been organised in such a way as to make that possible. Employees can discuss difficult issues, whether or not concerning integrity, outside the context of consultations, and this is also appreciated. Assistance is provided when employees indicate that there is something that they cannot do or do not feel up to doing. Employees give one another feedback on content and behaviour, and allow one another the room to perform and learn.



Sustainability

The Academy deals proactively with work pressure and sustainable career development. These are recurring topics of discussion and action. The added value of all training and coaching for the employee and the organisation is made clear.

6.3 Role of managers

Managers have an exemplary, condition-creating, and enforcing role in the area of integrity. They must be aware of the existence of dependence and inequality of power in relation to employees. They should therefore reflect on their own interpersonal behaviour and must create a safe and respectful environment within their department. Managers should be open and approachable, and should create the scope needed for people's talents to develop.

6.4 Personal relationships within the workplace

Besides being colleagues, employees may also be friends, partners, or relatives of one another. It is then even more important for all parties involved to be aware of the integrity risks that such personal relationships may entail. Those involved must ensure that they remain professional and objective.

It is undesirable for friends, partners, or family to work in the hierarchical chain, or for them to assess or check one another's work. If they do, it is important for them to discuss the integrity risks with each other and with the manager. A decision can then be taken on how the employees in question should deal with the situation. The options include specific work arrangements, a different division of tasks, or a transfer to another department or service unit.



7. Facilities to Promote Integrity

7.1 Suspected violation of scientific integrity

It is possible to verify scientific integrity by reporting possible violations. As pointed out in Section 3, the Academy conforms to the VSNU's [Netherlands Code of Conduct for Research Integrity](#) and it has also adopted the [Scientific Integrity Complaint Procedure](#).

Complaints that are reported (in writing) are investigated by the Scientific Integrity Complaint Procedure Committee, which then issues advice to the Academy's Board of Management. After the Board has rendered its preliminary decision, both the complainant and the person complained about have a period of six weeks in which they can lodge an appeal against that decision with the Netherlands Board on Research Integrity [*Landelijk Orgaan Wetenschappelijke Integriteit, "LOWI"*].

Before reporting a (suspected) violation of scientific integrity, an employee can contact the Scientific Integrity Counsellor.

7.2 Scientific Integrity Counsellor

Pursuant to the Academy's [Scientific Integrity Complaint Procedure](#), two Scientific Integrity Counsellors have been appointed: one for the life sciences and one for the social sciences and humanities.

The counsellor is the point of contact for questions and complaints regarding scientific integrity. He or she can act as a mediator regarding the complaint or can inform the person raising the issue about the procedure for filing a complaint. The counsellors are bound by a duty of confidentiality. Together with person raising the issue, the counsellor can determine the nature and seriousness of the suspicions and what possible steps should be taken.

The person raising the issue may also choose to discuss their questions or circumstances with colleagues, their manager, or the Board of Management, within the framework of the applicable procedure. It should be noted, however, that – in order to ensure independence – there are procedures in place to assess whether the suspicion is actually well-founded as regards the person concerned. Any damage to the reputation of that person must be avoided. The person raising the issue should therefore exercise caution when discussing or disclosing their suspicions to colleagues.

7.3 Desirable and undesirable behaviour

The Academy aims for a working atmosphere in which everyone can collaborate on the basis of mutual trust, respect, and correct behaviour. However, it is possible that undesirable interpersonal behaviour may occur.

The Academy considers intimidation, sexual harassment, baiting, aggression, and violence to be undesirable behaviour that will not be tolerated. The Academy's [Regulations on Desirable/Undesirable Interpersonal Behaviour](#) deal with such matters and include a complaint procedure. Complaints should be submitted to the secretary to the Academy's *Complaint Committee on Undesirable Interpersonal Behaviour*, which will then consider them. Both parties will be granted a hearing in the course of the procedure. The Complaint Committee consists of a fixed group of members and is independent. Submission, processing, and settlement of a complaint are carried out confidentially.

If an employee experiences or observes undesirable behaviour, he or she can discuss the matter with their manager, a colleague, or a confidential contact person, possibly before deciding to submit a complaint.

7.4 Confidential contact person on personnel matters and undesirable behaviour

If an employee finds him/herself in the situation of having to deal with undesirable behaviour, he/she can first attempt to discuss the matter with the person in question with a view to reaching a solution. He/she



can also of course approach their own manager, the P&O adviser, and/or the manager's immediate superior. If this does not produce the desired result, or if the employee does not feel comfortable with it, he/she can approach the confidential contact person. Some institutes have appointed an internal confidential contact person who the employee can call in. The employee can also turn to the external confidential counsellors, who the Academy has engaged via the GIMD, an independent organisation for guidance, training, and advice on industrial relations. If there is no internal confidential contact person or if the employee prefers to call in an expert from outside the Academy, he/she can contact the external confidential counsellor directly. The external confidential counsellor is an independent expert with whom the matter can be discussed confidentially. He/she can inform and advise the employee about the possible next steps, such as submitting a complaint.

7.5 Suspicion of violation of integrity, Whistleblower Regulation

If the provisions of one of the sets of regulations referred to in this overview are contravened, then there is a violation of integrity or an abuse. It may also be established pursuant to legislation and government regulations that there has been a violation of integrity. If an employee suspects a breach of integrity or an abuse, he/she can report it to the Academy on the basis of the Academy's [Whistleblower Regulation](#). The suspicion must be based on reasonable grounds, regarding, for example, a criminal offence, a gross violation of the rules, or a threat to public health, safety, or the environment (or an imminent case of any of these).

The basic assumption for the report is that the necessary measures must be taken to eliminate the abuse. The employee reporting their suspicion must not be disadvantaged in any way because he/she has made the report.



8. Consequences of Dereliction of Duty

If the provisions of one of the sets of regulations referred to in this overview are contravened, or if there is a violation of integrity under legislation or government regulations, this can be classified as a case of dereliction of duty. The consequences may involve the issuing of a warning or the imposition of a disciplinary measure pursuant to the Academy's [Disciplinary and Order Regulations](#). The severity of the disciplinary measure will depend on the nature and seriousness of the conduct concerned. The measure to be imposed must also be proportionate.

Careful investigation is always required before any disciplinary action is taken. The facts need to be established and the circumstances of the case must be taken into account. The principle of hearing both sides must also be observed. Only then will a decision be taken as to whether or not to impose a disciplinary measure.