

CODE OF CONDUCT ON INTEGRITY

University of Groningen

2017

Adopted by the Board of the University on 16 October 2017.

Last revision: 25 April 2018.

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1. Introduction

1.1 Why this Code of Conduct?

The Code of Conduct on Integrity provides a coherent picture of the University of Groningen's integrity policy. It forms the framework for explicitly bringing the main provisions regarding integrity to the attention of staff, thereby contributing to awareness of integrity-related issues and enhancing integrity within the organization. The Code of Conduct provides new staff with a guideline as to how the University of Groningen (UG) approaches rules and values.

The Code of Conduct on Integrity defines what is meant by integrity and acting with integrity. It also helps employees to identify risks, and to resist temptations and external pressure. And it helps them to understand what is and is not allowed in frequently occurring situations.

The Code of Conduct cannot cover every conceivable situation. It is therefore the employee's responsibility to reflect on whether they are acting with integrity. For this, they can base their actions on the core values of the UG, on general standards and on their own judgement. It is also important to continue to discuss these matters with managers and colleagues, especially in cases of doubt.

1.2 What is integrity?

The identity of the UG is reflected in the conduct and attitude of all members of the University community. In the [Strategic Plan 2015-2020](#) the UG has defined core values that determine the culture of the University. They are central to decision-making and collaboration between staff, students and stakeholders.

One of those core values is integrity, which is defined as follows: 'Integrity stands for honesty, openness and transparency in practices and in reporting, and it forms the foundation of our research and teaching. Integrity and academic freedom go hand in hand.'

Honesty

Staff should be honest and reliable, and should meet their agreements. Working at the UG should occur within an atmosphere of mutual trust and commitment. Employees should help and support one another where necessary.

Respect

Staff should refrain from engaging in undesirable forms of interaction. They should handle confidential and privacy-sensitive information with discretion. They should also allow scope for diversity in relation to beliefs, culture, gender and origins, as well as respect to the dignity and fundamental rights of other people. Nobody need feel excluded and inclusiveness is general.

Openness

Staff should ensure a climate of academic freedom, where communication can occur freely and openly. They should work to ensure a socially safe environment at the UG, in which everyone behaves responsibly and is willing to account for their conduct.

Transparency

The University is funded from public money that needs to be utilized carefully. Staff can make this transparent to the outside world. They should also be open to comments and feedback. Additional activities and interests should be reported. Conflicts of interest, including the appearance thereof, should be avoided.

Responsibility

Working for the University implies an obligation to society. Decisions should be carefully prepared, taking into account interests other than those of the UG alone. Staff should be prepared to provide explanations and to be accountable.

1.3 Who does the Code of Conduct apply to?

The Code of Conduct is written for staff of the UG, including PhD students, student assistants, students on placement and on-call staff. People other than UG employees also work at the UG, such as externally hired staff and employment agency staff. External staff are also expected to endorse the principles of the Code of Conduct and to act accordingly. The Code of Conduct should therefore be explicitly brought to the attention of external partners, for example during procurement, hiring and tendering procedures.

Every employee is expected to comply with the Code of Conduct and the provisions regarding integrity. In addition, the specific division where an employee works may have its own code of conduct, house rules and working instructions that the employee is also expected to observe.

This Code of Behaviour is not intended for students. The [Student Charter](#) applies to them.

1.4 What is the scope of the Code of Conduct?

Integrity is subject to different cultural (as well as individual) interpretations. It is therefore important for people to be able to discuss the subject. Through ongoing reflection in the workplace, integrity can come to occupy a more prominent place in people's consciousness, making it possible to specify the subject more closely and concretely. Opinions on integrity will then evolve gradually in step with developments and changes within society.

It should be pointed out that we already have various concrete rules and obligations relating to integrity from the past. The Code of Conduct on Integrity is an overarching document, while the detailed rules are contained in background documents. These rules are highlighted and referred to. The Code of Conduct on Integrity is therefore supplementary to the existing regulations and does not replace them.

2. Employers and employees

2.1 Being a good employer

Like any other employer, the UG has a duty of care to its employees. A good employer behaves properly towards its employees, respects their rights, does not abuse its position of authority, and ensures good working conditions and a safe working environment.

A comprehensive integrity policy is an essential part of this duty of care. This means, among other things, that the employer must protect its employees against integrity risks by structuring its organization and work processes accordingly (e.g. through segregation of duties), creating the required facilities (e.g. a confidential advisor), and drawing up rules regarding attitude and conduct (such as this Code of Conduct).

The UG is responsible for creating a socially safe climate so that integrity issues can be discussed and to promote awareness of what is meant by acting with integrity.

The Board of the University (CvB) has committed itself to the [Code of Good Governance](#) drawn up by the VSNU (Association of Universities in the Netherlands). When performing their duties, the members of the CvB can thus be held accountable.

The CvB reports to the UG's [Supervisory Board](#). The Supervisory Board is informed in good time and extensively in order to be able to perform its monitoring duty properly.

The members of the CvB will ensure that their administrative actions are transparent. They are open to critical input from staff and university consultative participation bodies, as well as to reports of irregularities.

The members of the CvB are open and transparent about the costs they declare. Information on this aspect is published in outlets such as the [Management Report](#). The provisions of the [Regulations on reimbursements for Board members of Dutch Universities](#)¹ apply.

2.2 Being a good employee

Staff are expected to behave as good employees. This behaviour is based on a number of core values that place integrity in a broader context: reliability, service, autonomy, impartiality, openness, confidentiality and attention to detail.

Among other things, being a good employee means that employees must use powers, resources and information in a scrupulous and responsible manner and must be guided by what serves the public interest. They must be able to resist temptations and to avoid risky situations. They should interpret both the letter and spirit of rules, and carefully consider legitimate rights, interests and expectations, including in situations where it is not (immediately) clear what the right choice is. Employees should also be willing to have their deliberations reviewed (either beforehand or afterwards) and to account for them.

These values define general norms and give direction to the conduct expected of an employee. Some areas, however, are subject to more specific norms and rules, and these are covered in the following sections.

This Code of Conduct helps to clarify what is meant by acting with integrity, and in this way further defines the concept of 'good employee'. By focusing on the intentions underlying these values, employees can make the right decision, including in situations for which the Code of Conduct does not specifically provide.

¹These VSNU regulations came into effect on 1 January 2018. The URL is accessible exclusively in Dutch.

Acting with integrity takes place in day-to-day practice and is not bound to a person's workplace and contracted hours. In our digital world with its flexible work methods, the line separating work and private life has become quite thin. It is therefore important for employees to be aware that private behaviour can have a negative impact on their acting as a good employee and may harm their employer.

3. Risks to integrity

3.1 Conflict of interest

In a conflict of interest, private and work interests are intertwined. As a consequence, a conflict of interests can present a threat to integrity. This matter requires constant attention, both from the organization and from its staff.

In a conflict of interest, an employee has private interests that conflict with and may adversely influence the execution of his or her University tasks and responsibilities. This may relate to financial interests, for example in the case of a (potential) loss or gain for the employee, their partner, family member or friend.

However, there could also be circumstances that do not involve financial gain or benefit, such as enhancing someone's career, education or professional reputation. It could also involve access to privileged information or specific facilities, or promoting a specific person or organization with whom or which the employee has a relationship, or disadvantaging a person or organization with whom/which this relationship does not exist.

The University recognizes that its staff have various interests and contacts within the local, national and international community. These links to external organizations are in the public interest and also benefit the University and the employee in question.

However, the University also recognizes that such connections may give rise to (potential) conflicts of interest. Conflicts of interest can have adverse effects not only on the University but also on the employee concerned and on his or her colleagues. It is important to recognize, address and resolve conflicts of interest in a timely fashion. Even if it turns out to be a false alarm, any potential conflict must be dealt with seriously and with integrity.

The responsibility for avoiding conflicts of interest rests with the employee. In case of doubt, the employee should consult his or her manager. The employee should immediately report any situation involving a (possible) conflict of interest.

3.2 Academic integrity

The UG strives for professional academic conduct and ethically sound research and teaching. It promotes academic integrity, since misconduct with regard to scholarship (such as plagiarism, data falsification and theft of intellectual property) must be avoided at all times. The UG also seeks to make ethically sound choices in all its activities, including a good animal testing policy and the responsible use of personal data.

Research quality at the UG is tested against the most stringent international norms. In addition, the UG enforces the [Netherlands Code of Conduct for Academic Practice](#) of the Association of Universities in the Netherlands (VSNU). Core values in this Code of Conduct are attention to detail, reliability, verifiability and autonomy. The UG also has its own [University of Groningen Regulations for the Protection of Academic Integrity](#), which outlines the steps that should be taken if academic standards are violated.

All staff involved in teaching and research at the UG are responsible for preventing and identifying academic misconduct. On their appointment to the University, researchers declare that they are familiar with and will adhere to the Netherlands Code of Conduct for Academic Practice. Researchers, PhD students and other students teach one another to conduct research with integrity and are able to report any suspicions they have of conduct that is incorrect and does not conform to standards of integrity (see also Section 6).

3.3 Additional activities

Dutch universities have three core tasks: carrying out academic research, providing academic teaching and making academic knowledge valuable for society. In this way universities

contribute to the community. In view of the last-mentioned core task (also known as valorization), close links between universities and commercial and non-commercial civil society organizations are important.

These contacts and forms of cooperation can involve the execution of additional activities by academic staff. Non-academic staff can also carry out activities outside the UG that can be considered additional activities.

Additional (or ancillary) activities are all activities carried out by a UG employee which are not performed in his or her capacity as a UG employee, regardless of whether the employee receives a remuneration for the activities, or whether the activities are carried out during or outside contracted hours.

Additional activities cover a wide range, such as membership² of an advisory board of a civil society organization, advisor to a private enterprise or as a self-employed person with their own company. Holding additional posts need not hamper independent and ethical academic practice or job performance. Universities therefore encourage additional activities for university staff, provided that academic independence and ethical job performance are safeguarded. Transparency concerning the additional activities is essential here.

United in VSNU, Dutch universities have decided on sector-wide rules regarding additional activities. An unequivocal policy will enhance the message that all university staff are expected to report their additional activities.

Not all additional activities have to be reported. Additional activities that take place outside contracted hours, and for which the employee does not receive any form of remuneration, and which do not interfere with the employee's job performance do not have to be reported. It should be made clear that these activities do not adversely affect the interests of the University in any way.

Additional activities that involve additional income must always be reported, however. Additional income also includes shares and other financial interests. This means, for example, that a shareholding in a spin-off company must be reported.

Responsibility for reporting additional activities rests with staff. At the very least, whether or not they are carrying out additional activities is discussed in the annual R&D interview. Agreements on this matter are then made and recorded.

Employees must publish their additional activities on the staff page. In the context of academic integrity and independence, these activities should of course also be reported in publications and grant applications.

Permission will not be granted for additional activities that are not compatible with the employee's position at the UG.

Good communications are essential in order to ensure proper and proactive compliance with VSNU's [Sectoral scheme covering ancillary activities](#) by all those involved. It is also very important to create a culture in which this subject can be discussed.

3.4 Accepting gifts

² Due to the taking effect of the Sectoral scheme covering ancillary activities, the subclause 'as a member of the periodical editing board' has been omitted. This example was based on previous online information concerning ancillary activities provided by the University of Groningen, but was at odds with the Sectoral scheme covering ancillary activities.

An employee may encounter a situation in which he or she is offered something by a business associate. This could be a tangible gift, but also a service or favour. This creates integrity risks such as the risk of influence or a conflict of interest. It is essential for the employee to safeguard his or her independence and to avoid even the semblance of a conflict of interest.

The context in which something is offered is also important. This applies not just to accepting gifts, but also to invitations, such as invitations to special theatrical or sporting events.

The basic principle for payments, remunerations (including services or favours) and gifts is that these should not be accepted unless the employer grants permission (see Article 1.15 of the [Collective Labour Agreement of Dutch Universities](#)).

A further important principle is that gifts and invitations from third parties may only be accepted if they are functional, restrained and appropriate and do not compromise independence.

Provided there is no influence over the employee's independence, occasional small gifts with a value of €50 or less may be readily accepted. Should the value of the gift be higher, the employee should inform his or her manager and they should agree on a course of action.

3.5 Procurement, tendering and hiring

Because financial transactions are involved, the tendering and procurement process is highly sensitive when it comes to violations of integrity. Employees must therefore always bear in mind that they are spending public funds. This has to be done carefully, effectively and independently, and in a spirit of honest competition. All staff responsible for procurement and/or tendering must at all times remain aware of and strictly comply with the prevailing rules.

Employees in charge of procurement and tendering should specifically be wary about corruption and bribes, and make sure that they avoid favouritism, manipulation or conflict of interest (or any appearance thereof). They should treat available information with care and avoid making unwarranted commitments or creating expectations when negotiating with potential suppliers.

Employees should refrain from interference that might lead to them becoming involved in procurement activities on a personal rather than a professional basis. Employees should not take part in consultation or negotiation situations in which family members, their partner and/or friends are present or are working on behalf of the external negotiating party/parties. Employees are not permitted to make private purchases via the employer.

It goes without saying that offering, accepting or awarding special favours is not permitted. Special favours are defined as benefits granted to the transaction partner that may injure other parties or persons legally or financially. This includes such practices as giving someone precedence in purchases or sales, directly awarding orders that should have been tendered according to the guidelines, or unreservedly promising follow-up orders or replacement orders.

Major contracts and tenders

Procurement, tendering and deliveries occur on a large scale every day at the UG. The University has concluded central contracts for many products and services so that price agreements and supply conditions are clear. For sums above a fixed amount, various procurement procedures have been agreed, with which everyone working for a division of the UG must comply.

For purchases with a higher order value, the Procurement Management department (IM) of the University services department (FB) plays a key role in organizing the various contracts that should be put out to European tender (under the Dutch Public Procurement Act), or out to contract by private tender. Procurement advisors in the IM department also conform to the NEVI Code of Conduct, as set out in the [UG policy on ordering and purchasing](#).

3.6 Financial interests in enterprises

It may happen that a University of Groningen employee has financial interests in one or more companies that are not listed on the stock exchange, or that he or she trades in stocks or is planning to do so. This can entail the risk of a conflict of interest, or the problem of prior knowledge and the potential misuse of price-sensitive information. It is important to remain open and willing to talk about these things. This also includes the financial interests of the employee's partner, because such interests are indirectly shared by the employee in question.

If an employee has financial interests as described above, the following applies: In accordance with the [Regulations Concerning Additional Interests³](#), the employee should report his or her financial interests that may affect the interests of the UG, insofar as they relate to the employee's job performance. An employee may have a financial interest in an enterprise that has a relationship with the UG. A financial interest greater than 4.99% is in all cases regarded as being in conflict with the interests of the UG. In case of doubt regarding the notification obligation, the employee should contact his or her manager.

Financial interests that may harm the UG are not permitted. Confidential price-sensitive information obtained by the employee by virtue of his or her position should be kept strictly confidential and never be used for personal gain.

3.7 Intellectual property

Employees who come up with a patentable invention during or in connection with their work must report this in writing to their employer, as set out in the Collective Labour Agreement of Dutch Universities. In addition, the Dutch Patents Act stipulates that ownership of the invention belongs to the employer or University.

Wherever possible, the reporting obligation also applies when an employee creates a work that is protected by copyright. The UG/UMCG policy on intellectual property (IP) dates from 2008 and mainly concerns patentable IP. Policy is currently being developed on non-patentable IP.

Acknowledgement is a key aim of this policy. The UG wishes to be acknowledged in patent applications where the inventor is a UG employee. This is important for the University's reputation, PR and rankings and encourages new research/contract research.

The UG also seeks reasonable financial compensation. If IP is transferred to third parties or a licence is issued, the UG/UMCG requests a market-based form of compensation.

More information on patent policy and the relevant procedure upon making a patentable invention can be found in the brochure 'The value of knowledge': www.rug.nl/mu/patents

³ The Regulations Concerning Additional Interests University of Groningen has been suspended from 1 January 2018 due to the taking effect of the Sectoral scheme covering ancillary activities, with additions for the University of Groningen, from that date onwards.

4. Use of information, facilities and resources

4.1 Confidential information

University of Groningen employees usually have access to a great deal of information, including confidential and special personal data. Under Article 1.16 of the [Collective Labour Agreement of Dutch Universities](#), employees are obliged to keep confidential all information derived from their position. This obligation also applies following termination of the employment contract.

Employees are expected to protect the confidentiality of information, to use it only for the purpose for which it was provided, and to only share it insofar as appropriate. This means not only that an employee is not allowed to publicize confidential information, but also that he or she should handle it carefully and ensure that other parties cannot access it. If an employee notices any careless use of information, he or she should report it to the manager.

Employees are expected to be aware of the risks involved. This requires treating information and data carriers (such as iPads, smartphones and USB sticks) with care and complying with specific information and other security rules. Employees should make sure that their data carriers are protected with passwords and access codes. If this is technically impossible, the information itself should be encrypted as far as possible.

4.2 Personal data and data breaches

Everybody has a right to respect for and protection of their private life and to have their personal data treated with care. The rules regarding privacy have been laid down in the Data Protection Regulation. Every employee should treat personal data with care and use it only for the purpose for which it was collected.

Treating personal data with proper care also means taking account of the rights and wishes of those whose personal data is being processed. Staff and students have a right to know what elements of their personal data are being used by third parties, and for what purpose. The University has appointed a [Data Protection Officer](#), who can be consulted on this matter as an independent advisor.

In the absence of granting consent or some other legal basis, personal data may not be released to third parties. If an employee is asked by a third party to hand over personal data, he or she should contact his or her manager. It goes without saying that the manager may never force the employee to act in breach of the Data Protection Regulation.

One specific type of security incident is a data breach. This is when personal data is lost or if illegal processing of personal data cannot be reasonably ruled out. Security incidents also refer to situations such as the loss of a USB stick, the loss or theft of written documents containing personal data, the theft of a laptop or a break-in by a hacker.

The UG is legally obliged to report all data breaches within 72 hours to the Data Protection Authority. In situations involving or potentially involving a data breach, employees should not contact the Data Protection Authority themselves, but instead should report the incident immediately to the central hotline at cert@security.rug.nl.

4.3 Buildings and grounds

The use of UG buildings and grounds is subject to the [University of Groningen Regulations Concerning the Use of University Buildings, Grounds and other Facilities](#). These regulations specify that any employee who is either physically in the buildings or on the grounds of the University, or who is making use of the University's facilities, is required to adhere to the rules, guidelines and instructions.

Employees may not cause either direct or indirect damage to the University or to any third party who is making use of University buildings, grounds or facilities. They also must not infringe on the rights of the University or other people mentioned above. They must not act in a way that contravenes legal obligations or does not comply with the standards of behaviour deemed appropriate in social interactions.

4.4 Use of resources and facilities

For the performance of their tasks, employees are given access to University resources and facilities, such as a workplace, a computer, office supplies, laboratory equipment, printers and copiers, an email address and internet access. In some cases employees are also provided with a University laptop or telephone on loan.

Employees are expected to respect the fact that these resources have been financed with public funds. They are expected to use these resources and facilities for their intended purpose and treat them responsibly and with proper care. Employees are expected to take account of any specific conditions of use and security rules or contractual conditions that apply.

Contemporary employment relationships allow for private use of company resources and facilities. However, misuse in the form of excessive, immoderate, unnecessary, disruptive or harmful private use is not permitted.

It is neither desirable nor possible to precisely indicate in advance what counts as misuse and what does not. This means that we appeal to the employee's own sense of responsibility and judgement. Employees should keep in mind that these resources and facilities are financed with public funds. There will always be a grey zone: where necessary, employees should discuss with their manager what is permissible.

4.5 Claiming expenses

Some expenses that employees incur in the performance of and/or for the purpose of their work are reimbursed by the employer. When claiming such expenses, employees must be aware that resources are involved that have largely been financed with public funds. The principle is therefore that employees should strive to limit the claimable expenses.⁴

Employees should ensure when submitting claims that the expenses are clear and transparent. Proof of the expenses incurred (in the form of receipts or invoices) should therefore be included with the claim.

4.6 IT and internet use

The [Acceptable Use Policy of the University of Groningen for University Computer Systems](#) contains rules regarding the use of computer systems offered by the UG to its students, staff, temporary staff, visitors and others who have an agreement with the University. Users must use the UG computer systems with care, must not send any unwanted emails, and must not capture or use access data of others (either openly or in secret).

If there are indications of past or present misuse of University computer systems by a University user, steps will be taken to safeguard the security and integrity of these systems. Any suspicions about such misuse should be reported to the Faculty Board or the management of the department to which the University user belongs. This may lead to content checks by system management of the way in which the person in question is using his or her account.

⁴ More information about reimbursements can be found on the [Financial Shared Service Centre \(FSSC\)](#) website.

Social media

The use of social media merits special attention. Social media can have a major impact because they allow information to be disseminated on a massive scale and in a very short space of time, which is then permanently available on the internet. Improper, incorrect and unethical use can bring great harm to the university and to the people who work and study there, or who are there in some other capacity.

The rules of social interaction in the 'real' world should therefore also apply to contacts via social media: staff and students must take account of one another, listen to one another and respect differences regarding ethnic or national origin, religious beliefs, gender, sexual preference and disabilities (see also Section 5).

5. Standards of behaviour

5.1 Respect

The UG supports a good, socially safe work and study environment, where people behave respectfully towards one another, and where mutual acceptance and trust are important values. A good standard of behaviour means that staff take account of one another, listen to one another and respect differences regarding ethnic or national origin, religious beliefs, gender, sexual preference and disabilities.

Good standards of behaviour have a positive effect on working together and hence on staff enjoyment in their work; they benefit health, professionalism and productivity. Managers should be aware of their own exemplary role and their influence in this area.

Staff are expected to refrain from any form of undesirable behaviour, in particular bullying, sexual harassment, aggression, violence and discrimination. These forms of behaviour are subject to the [University of Groningen Code of Conduct Concerning Harassment, Sexual Harassment, Aggression, Violence and Discrimination](#), and the [University of Groningen Complaints Procedure Concerning Harassment, Sexual Harassment, Aggression, Violence and Discrimination](#) (see also 6.5).

5.2 Role of manager

Managers have an enabling and enforcement role when it comes to integrity. As well as reflecting on their own standards of behaviour, managers fulfil an exemplary role within their department or unit, where they should create a safe and respectful environment. This means that managers should be open and approachable, and should provide and ask for feedback; they should also allow scope for the development of talent. Managers should be aware of the dependence relations and power imbalances that exist vis-à-vis their staff.

5.3 Teacher-student relationship

The relationship between teaching staff and students is a special one, in view of the dependent and unequal power relationship. Teaching staff must constantly be aware of this fact. They must also be aware of their exemplary role and should communicate in both word and deed the standards set out in this Code of Conduct.

Teaching staff must observe the necessary distance in their relations with individual students and must keep these on a professional footing. They must not abuse the relationship of trust that exists between teachers and students; respectful treatment must be paramount.

Teaching staff should avoid personal contact with individual students in situations or places that could evoke the semblance of bullying, sexual harassment or abuse of power. Teaching and other staff should also call one another to account on this matter and point out (possible) occurrences of improper behaviour.

Teaching staff should ensure that there is no merging of personal and professional relations. If a relationship of a personal or intimate nature develops between a teacher and a student, the teacher must ensure that he/she does not have to assess the educational and research performance of the student in question or in any other way have to make decisions about that student. The teacher must inform his or her manager about the existence of the relationship.

Students attach considerable importance to the quality of teaching and the enthusiasm of their teachers. Teaching staff should therefore strive to constantly improve themselves. They should ensure high-quality content of their course units and indicate clearly what is expected of students. Teachers must ensure that all assignments and exams are aligned with the course unit objectives and that students are assessed in a responsible way.

Teaching staff should avoid a situation in which students benefit unduly from work done by their peers. They should adhere to their lecture timetable and their agreements, adopt a positive attitude to constructive feedback and make themselves available at reasonable times to students, both in person and via email.

5.4 Relationships in the workplace

It may happen that staff at the UG are not only one another's colleagues, but also friends, partners or family. In such cases it is particularly important that all parties concerned remain professional and objective and that they are aware of the risks to integrity that these private relationships can entail.

Situations in which friends, partners or family members work in a hierarchical relationship or assess or check one another's work are undesirable. If these situations do arise, however, it is important that the potential risks to integrity are explicitly discussed with the relevant manager. The manager will examine, together with the employee concerned, how the situation should be dealt with. If necessary, work agreements should be made or tasks re-assigned. Another possibility is a transfer to another department or division.

6. Questions, reporting irregularities and complaints

6.1 Formal or informal

Staff are expected to take action if they suspect that rules and regulations and/or standards in this Code of Conduct on Integrity are violated. It is preferable to take the informal route in the first instance: talking to the person who has caused the problem and jointly arriving at a satisfactory solution.

If this is not desirable or possible, the suspected irregularity can be discussed with the immediate manager. If these options are not suitable, a decision may be made to report the irregularity to a higher level within the organization, to the Faculty Board or to department management. If an employee needs help with making this consideration, he or she can talk to the HR advisor. An employee can also choose to discuss the situation confidentially with the confidential advisor (see 6.2).

If the informal route is not appropriate or does not lead to a solution, it is possible to make a formal report of an integrity violation or to lodge a formal complaint in the event of unwanted behaviour (see 6.3 and 6.4).

6.2 Confidential advisor

If integrity issues cannot be discussed and resolved in direct consultation between the employee and his or her manager, the employee can consult the [confidential advisor](#).

The confidential advisor is independent, lends a listening ear, provides information, offers advice and mediates where necessary. Any questions, doubts or suspicions can be discussed in confidence. Carefulness and reliability form the basis for the proper functioning of a confidential advisor. The confidential advisor's work sphere covers three areas:

Undesirable behaviour

If an employee is the victim of undesirable behaviour, such as bullying, sexual harassment, aggression, violence or discrimination, he or she can make an appointment with the confidential advisor to discuss the problem in a confidential setting. The confidential advisor only informs third parties with the employee's express permission. The confidential advisor is the first port of call and advises, supports and informs staff and students about the different routes that are available for resolving the problem or filing a complaint (see the [website](#)).

Integrity

If an employee suspects an actual or impending violation of integrity, he or she can go to the confidential advisor to discuss the issue in a confidential setting. The confidential advisor will also inform the employee or student of the need to report integrity violations (confidentially, if necessary). The confidential advisor is the first point of contact and advises, supports and informs staff and students about the regulations on reporting a violation.

Collaboration problems

If an employee has difficulties working with someone, talking to the (next-level) manager may be the first step towards a solution. If this discussion seems too difficult, a discussion with the HR advisor could be a useful intermediate step.

If these steps do not lead to a satisfactory solution, the employee can approach the confidential advisor to discuss these problems in confidence. The tasks of the confidential advisor are primarily to support and supervise the employee in finding a solution themselves. The confidential advisor may intervene if necessary, but does not act as an authorized representative of or on behalf of the employee, nor as a mediator.

6.3 Suspected violation of integrity

A violation of integrity breach of integrity or integrity-related irregularity occurs when this Code of Conduct on Integrity is infringed, but also for example in the event of an actual (or impending) criminal offence or danger to public health, safety or the environment.

If an employee suspects an irregularity, he or she should report it to his or her manager, the Faculty Board, the Board of the University, or the Supervisory Board. The procedure and safeguards are set out in the [General Complaints Procedure](#). A suspected irregularity does not include suspected violations of academic integrity, for which there is a separate complaints regulation (see the next section).

6.4 Suspected violation of academic integrity

One of the instruments for safeguarding academic integrity is the right to report anyone violating (or suspected of violating) academic integrity. To this end, the UG has established the [University of Groningen Regulations for the Protection of Academic Integrity](#).

Confidential advisor for academic integrity

The UG has appointed [confidential advisors for academic integrity](#). They are the first point of contact for questions or circumstances relating to academic integrity and suspected violations by UG employees or former employees. The confidential advisors have an obligation of confidentiality and are not members of the Academic Integrity Committee, which investigates suspected violations of academic integrity.

The main task of the confidential advisors for academic integrity is to provide advice and to indicate the possible routes and procedures to be followed. Together with the person making the report, the confidential advisor will assess the nature and seriousness of the suspected violations and explore possible courses of action. The person making the report can of course choose to first discuss the questions or circumstances with his or her immediate colleagues or the Academic Director of the institute.

LOWI

If the person making the report or the defendant does not agree with the recommendation of the Academic Integrity Committee and the (initial) decision of the Board of the University, they may submit their case to the Netherlands Board on Research Integrity (LOWI). The LOWI will then issue an independent recommendation to the Board of the University.

6.5 Undesirable behaviour

Staff who have complaints about bullying, sexual harassment, aggression, violence or discrimination can submit these to the Board of the University (see the [Complaints Regulation](#)). The Board of the University has set up an independent committee to deal with these formal complaints: the Complaints Committee for Sexual Harassment, Aggression, Violence and Discrimination (SIAGD). The submission of the complaint and the administration of the procedure is treated with strict confidentiality.

7. Enforcement

One component of an integrity policy is its enforcement. A violation of this Code of Conduct on Integrity and the underlying regulations and legislation relating to integrity can result in various sanctions. These may range from a simple warning to a much harsher penalty. If the violation can be considered a dereliction of duty, a penalty will be imposed, which can range from a reprimand to dismissal, depending on the severity of the behaviour in question.

Dereliction of duty occurs when an employee does not behave in a way expected of a good employee. Dereliction of duty also covers the infringement of a statutory regulation, doing what a good employee should not do, or failing to do what a good employee should do.

Before steps are taken to impose a sanction, a thorough investigation will always be carried out. The facts must be properly established, relevant circumstances must be taken into account, and both parties must have a right to be heard. The Board of the University will make the final deliberation, after which a decision will be made about the sanction to be imposed.

In the event of a justified suspicion of a criminal offence the Board of the University will also refer the matter to the police and the judiciary for criminal prosecution.