

# Integrity policies at the University of Twente

## *An integrated perspective on integrity and a plan of action*

**June 2019**

### **Executive summary**

This document proposes an integrated perspective on integrity policies, a 'house of integrity' as an approach to structure and organize the various integrity(-related) policies, regulations and practices. The document proposes a plan of action for further advancing integrity at the UT: a line of action to implement the new Netherlands code of research integrity and a line of action to move towards an integrated set of integrity policies and procedures. A communication plan is developed in order to support these lines of actions. To implement the action lines a capacity and budget plan is drafted which requires formal approval.

Actions have already been initiated to implement the new code of conduct and reinforce social integrity policies and culture at the UT, but further actions are necessary in order to comply with current standards and practices. As well known, integrity is a broad subject including various dimensions such as scientific integrity (e.g. good data management, research ethics), social integrity (e.g. relations at the workplace) and business integrity (e.g. security, privacy of employees) contributing to a voice and trust culture. The University of Twente aims to be an institution with up-to-date integrity policies and practices by learning and adapting from the best practices of others and own (organisation-specific) experiences and inventions. The action plan proposes a set of actions to realize this ambition.

## 1. State of affairs integrity policies at the UT

Integrity, the responsible conduct of employers and employees, is a subject on the move. Integrity is a broad subject including various dimensions such as scientific integrity (e.g. good data management, research ethics) social integrity (e.g. relations at the workplace) and business integrity (e.g. security, privacy of employees). Recent developments on the European, national and local level urge the UT to reflect on and take action for reinforcing her policies and practices in this area. Appendix 1 offers a brief overview of recent developments. Actions have already been initiated to implement the new code of conduct of research integrity and to reinforce UT policies regarding social integrity.

### 1.1 Social integrity

In the field of scientific integrity, new codes of conduct have been introduced in 2017 (ALLEA) and 2018 (Netherlands code of conduct). Also concerning social integrity the UT pursues the highest standards. Following an audit of the labour inspectorate in 2017, new policies and practices have been developed regarding violence and aggression including updating the code of conduct on (un)accepted behaviour, introduction of an aggression protocol, installing a registration system and training for employees as well as students. Early this year the UT offered an 'Active Bystander Training' to train and support UT employees how to act when they observe a conflict or behaviour that is unacceptable. Moreover, the UT is participating in the 'Pilot Ombudsperson', a project university employers and unions have agreed upon. As part of the preparations for this pilot, a study is being conducted towards the UT complaints procedures for employees and staff. The draft report of this study is currently available.

### 1.2 Scientific integrity

The new Netherlands code of conduct requires the UT to revise and further strengthen scientific integrity policies and implement them across the whole university. Many of the elements of the new code of conduct are already addressed in current policies. The table below offers a birds'-eye view on the main lines of the new code of conduct and current state of affairs regarding duties of care at the University of Twente.

Institutions' duties of care	State of affairs	Attention points
<b>Training and supervision</b>	<ul style="list-style-type: none"> <li>Scientific integrity training for PhD candidates (Twente Graduate School).</li> <li>Integrity education included in ITC curriculum academic skills. ITC experiments with DMP for MSc students.</li> </ul>	Training for postdocs and staff is currently missing. Unknown: integrity education in BSc/MSc curricula. No additional actions taken yet – see action plan.
<b>Research culture</b>	<ul style="list-style-type: none"> <li>Internal audit 'Governance Risk and Compliance' late 2018/early 2019 assessed integrity culture.</li> <li>Research support coordinator ITC organizes discussions on integrity at departments.</li> <li>TNW has planned signing of code of conduct as part of its strategic plan.</li> <li>BMS is developing a program on integrity in Academia with 'productiehuis Plezant'</li> </ul>	Awareness and reflection requires ongoing attention. No additional actions taken yet – see action plan.
<b>Data management</b>	<ul style="list-style-type: none"> <li>New research data management policy (Fall 2018), implementation plan being executed.</li> <li>New data stewards appointed for Health (TNW) and Engineering Technology.</li> <li>Proposal for additional capacity being developed, in proposal phase by PHs Operations.</li> </ul>	Execution, development of data management plans and archiving of research data require ongoing attention. See action plan.

	<ul style="list-style-type: none"> <li>• Research support site BMS, data management procedures BMS lab/</li> <li>• Support for researchers regarding Data Management plans.</li> <li>• ITC explores integrated approach for RDM, GDPR and research ethics application.</li> </ul>	
<b>Publication and dissemination</b>	<ul style="list-style-type: none"> <li>• No specific ongoing actions.</li> </ul>	Assessment of external communication and awareness regarding integrity. No additional actions taken yet – see action plan.
<b>Ethical norms and procedures</b>	<ul style="list-style-type: none"> <li>• Ethical committees ITC, BMS and EWI. ET collaborates with EWI committee regarding research ethics.</li> <li>• New online ethics application portal BMS end 2018.</li> <li>• New ethical policy for all UT faculties in decision-making phase. New collaborative agreements with Radboud UMC regarding medical-ethical assessment and animal experiments. National model complaints procedure scientific integrity currently under revision.</li> </ul>	Implementation of ethical committees across UT and revision of integrity complaints procedure. See action plan.

Table 1: State of affairs regarding duties of care at the University of Twente – June 2019

### 1.3 Integration of policies and practices

As noted by JA@UT currently integrity policies are not integrated: separate policy documents developed by different organizational units with limited coordination and stored at different places. There also is limited communication by the confidential advisors and for instance confidential advisors for scientific integrity. A first step towards integration is made by providing integrity information at one location via the new integrity website. The site is currently a collection of different integrity sites at the UT: <http://utwente.nl/integrity>.

## 2. Vision on integrity, a house of integrity

The new codes of conduct, requirements of the Labor Inspectorate and observations and recommendations proposed by JA@UT and the audit committee Governance, Risk and Compliance call for an integrated approach on integrity. This section proposes to work towards a house of integrity in which all facets of integrity and responsible behavior are included. It allows for an integrated, phased approach to strengthen and further develop specific elements of integrity, such as scientific integrity within a single framework.

### 2.1 UT position towards integrity and integrity policies

Integrity, whether related to purchasing practices, scientific integrity, responsible use of ICT, proper conduct at the workplace or plagiarism in educational programs, is a sine qua non and key value of the university. It is a foundation on which academia is built. Integrity is not a strategic value in the sense of a theme in which the UT aims to distinguish itself from other knowledge institutes. Integrity is relevant for all organizations. The UT aims to foster responsible behavior of researchers and supporting staff - compliant with current Dutch/European norms and standards and supported by effective policies - which secure reliability and legitimacy of researchers and the university as an institution.

Institutions' approaches towards the key value integrity vary on a continuum from 'basic preconditions met' to 'front running innovators'. Institutions may choose to act as frontrunners, which e.g. experiment with new practices and tools to stimulate responsible behaviour, or prefer a fast follower position. In this paper the latter position is assumed: the University of Twente aims to be an institution with up-to-date integrity policies and practices by learning and adapting from the best practices of others and own (organisation-specific) experiences and inventions.

### 2.2 Perspective on the approach of interrelated integrity domains

Academic, business and social integrity are often understood and considered as different and unrelated. However, obligations and evidence beg for an integral approach. For example:

- Bound by rules and laws, Dutch universities and other scientific institutions have agency obligations for establishing prerequisites for scientific integrity and an aggression-free environment;
- Evidence shows that those who show deceitful behaviour can cross the lines of different integrity fields. In other words, it is not unusual that one person can violate academic, business and social integrity<sup>1</sup>.
- Scientists as well as students are expected to live up to the highest levels of integrity. Moreover, employee deceit and aggression can affect students and vice versa.
- Other organisations treat academic and other forms of integrity as a whole. E.g.: TuDelft vision on integrity, MIT's Mind and Hand book for students; MIT's policies on personal conduct.

At present, integrity policies and procedures are organized separately at the UT. To improve coordination and alignment, the University of Twente may choose to work towards a 'House of Integrity'. Such a House of integrity is conceptualized as a house with different rooms, but with the

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<sup>1</sup> See, for example these cases: <https://www.theguardian.com/science/2017/sep/01/paolo-macchiarini-scientist-surgeon-rise-and-fall> and <https://retractionwatch.com/2018/06/21/he-was-once-a-prominent-cancer-researcher-then-his-gambling-and-a-finding-of-scientific-misconduct-got-in-the-way/>

acknowledgement that in a functioning household inhabitants communicate, support and cooperate with each other (see figure 1).

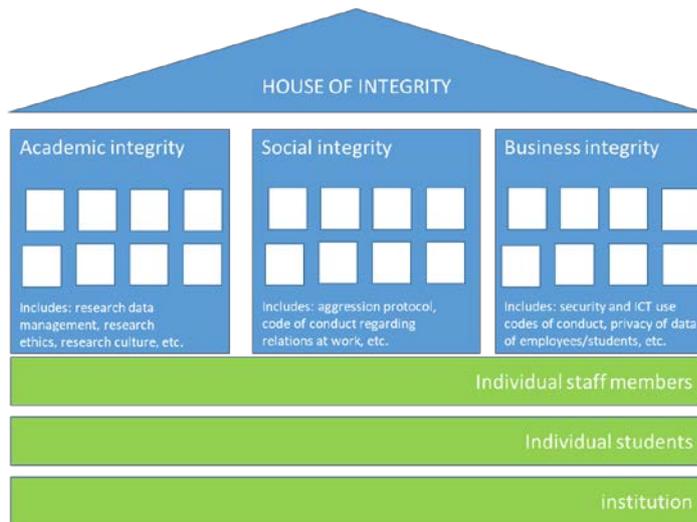


Figure 1: Integrated perspective on integrity – house of integrity

The first steps for constructing this house have been already taken by:

- Building and maintaining a steady network of UT employees located on the central and local level who work together on integrating scientific, business and personal integrity on a structural base;
- Constructing an Integrity@UT website where employees and students can find all information about integrity topics: [www.utwente.nl/integrity](http://www.utwente.nl/integrity);
- Breaking through the demarcations between employees and students by ongoing information exchange among stakeholders (S&B, student deans, HR, Student Union, etc.).

For further strengthening the fundamentals of the House of Integrity, a recurring Integrity event for all relevant stakeholders is recommended. For instance by gathering all confidential advisors and members of the various complaint committees. The event aims towards the further strengthening of the UT's integrity network, reflection on integrity cases and actual working on improvements related to procedures and rules.

## 4. Plan of action

In the next sections two action lines are described with two different objectives. To support the action lines a communication plan is proposed (see Appendix).

- Action line 1: Actions to implement the new Dutch code of research integrity.
- Action line 2: Actions to create a supporting organizational structure to improve coherence of integrity policies across the UT.

### 4.1 Action line 1: Implementation program Dutch Code of Conduct for Scientific Integrity

#### Introduction action line

In consultation with the faculties and service departments an action plan has been developed which addresses the major attention points identified in table 1. The action plan builds upon a previous action plan proposed in Autumn 2018 but has been reduced in size in order to enhance feasibility of its execution. The action plan formulates results and allocates responsibilities.

#### Objectives of the action line

The action plan is set up as a temporary project to establish the provisions (e.g. RDM infrastructure, training, ethical committees) in order to realize the duties of care to which the UT has committed itself and to nurture an integrity culture at the UT. Main objectives of the action line are:

- Raise awareness among scientists regarding the new code of conduct for research integrity.
- Realize the provisions which are part of the institution's duties of care.
- Stimulate the use of the provisions offered by the UT.

After the end of this project it is recommended to evaluate the activities and formulate actions to ensure continuity and embed specific actions such as training in the organization.

#### Description of the results of the action line

The action plan consists of 5 work packages which address the duties of care. The main features of the work packages are described below. Project schedules are indicative : depending on capacity and priority setting by faculties and services departments of individual work packages.

Work package 1: Training and Supervision				
Description of results				
	Description of results	Criteria	Responsible	Draft Schedule
1.1	(extensive) course for junior staff: Basic Qualification Scientific Integrity (included in course offering department Training & Development). Course elements include: discussion of 'good' practices, research data management, research ethics.	Course endorsed by Faculty Boards	HR (Baars)	2019-2020
1.2	Short course for senior staff with supervision responsibilities (included in course offering department Training & Development). Course elements include: coaching on 'good' practices, facilitating and creating a responsible research culture, dilemma games and discussion.	Course endorsed by Faculty Boards	HR (Baars)	2019-2020

Work package 1: Training and Supervision				
1.3	Junior staff follows training	>30% followed course in 2019	Faculty Boards (DBV, PH OZ)	2019-2020
1.4	Senior staff follows training	>50% followed course in 2019	Faculty Boards (DBV, PH OZ)	2019-2020
1.5	BSc and MSc students receive training in scientific integrity (norms and practices, research data management, research ethics) which is finished before start of the thesis assignment	>50% of BSc and MSc students working in thesis in 2019	Faculty Boards (DBV, PH OZ)	2020

Work package 2: Research Culture				
This work package supports, in combination with work package 1, a culture of integrity at the UT and responsible behavior of staff regarding research integrity. Tools and methods at other universities such as dilemma games, fictive or actual cases of misconduct for discussion, theatrical performances, and experiences with signing codes may be reused for this work package.				
	Description of results	Criteria	Responsible	Draft Schedule
2.1	Signing of Code of Conduct research integrity at appointment.	>100% of new employees since April 2019	HR (Baars)	September–ongoing
2.2	General invitation for signing Code of Conduct by all scientific employees + support staff	>75% in 2019	HR (Baars)	2019-2020
2.3	Enforcement of signing of Code of Conduct and communication about code of conduct within the faculty	>75% in 2019	Faculty Boards (DBV, PH OZ)	2019-2020
2.4	Discussion meetings on scientific integrity in the faculty (new policies, roles of department heads, culture of integrity). Depending on the chosen form of training offered in work package 1, this activity may be redundant.	Meetings with chair holders, meetings with junior staff	Faculty Boards (DBV, PH OZ)	2019-2020
2.5	Meetings at chair group level to discuss integrity cases, dilemmas, good practices; stimulation of intervision /peer-to-peer learning related to good research practices	> 50% of clusters/departments in 2019	Faculty Boards (DBV, PH OZ)	2019-2020

Work package 3: Data Management				
This work package is included in order to be comprehensive, but does not require separate action. With the launch of the new RDM policy in 2018 an implementation plan was included. Responsibility for execution of the implementation plan is delegated to the portfolio holders operations. Implementing the RDM policy will address the duties of care regarding data management as specified in the new Dutch Code of Conduct for research integrity.				
	Description of results	Criteria	Responsible	Draft Schedule
3.1	Execution of RDM Implementation Plan, which includes implementation of the UT RDM policy from January 2019 onwards; compliance with duty of care Data Management; compliance with requests of research funders regarding data management plans; compliance with stakeholders requests regarding FAIR data;	(see RDM implementation plan)	Faculty Boards (DBV, PH OZ)	ongoing activities

<b>Work package 3: Data Management</b>				
	including a section on data in all UT research proposals and projects.			
3.2	Further development of portal for researchers with tools for and information on RDM, Privacy, Research ethics, library services etc. Development of proposal for integrated system.	Integration of information at one website	LISA (Drent)	2019-2020

<b>Work package 4: Publication and Dissemination</b>				
The work package publication and dissemination focuses on supporting legal and communication activities around the dissemination of data and research results.				
	<b>Description of results</b>	<b>Criteria</b>	<b>Responsible</b>	<b>Draft Schedule</b>
4.1	Guidelines, list of attention points for evaluating agreements with other parties regarding publication or non-publication of data and research materials. Guidelines take into account intellectual property issues, Open Science perspective and FAIR data policies.	Guidelines endorsed by Executive Board and Faculty Boards in 2019	GA (Van Roosmalen) / LISA (Drent)	2019-2020
4.2	Guidelines, list of attention points for communication of research results to the general public	Guidelines endorsed by Executive Board and Faculty Boards in 2019	Marketing & Communication (Lankhaar)	2019

<b>Work package 5: Ethical Norms and Procedures</b>				
This work package aims at developing services and tools to support researchers to comply with (ethical) norms and standards as specified in the code of conduct.				
	<b>Description of results</b>	<b>Criteria</b>	<b>Responsible</b>	<b>Draft Schedule</b>
5.1	New research ethics policy	Accepted by Faculty Boards and Executive Board in Fall 2019	Strategy & Policy (Te Kulve)	Ongoing – October 2019
5.2	Appointment of committees, execution of research ethics policy, translation into operational procedures (self-assessment tool) and communication within faculty	Start in Spring 2019	Faculty Boards (DBV, PH OZ)	2019
5.3	Revision complaints procedure scientific integrity. Aligned with new national model for integrity complaints procedure.	Accepted by Executive Board in December 2019	Strategy & Policy (Te Kulve)	2019-2020

### Project structure of the action line

The executive board and the faculty boards act as sponsor for the implementation of the code of conduct. The project management structure is illustrated in figure 2. A lean management structure is proposed to limit the burden on the organization. A project coordinator will be appointed who will facilitate alignment between service departments and faculties and monitors progress. Dedicated teams will be created to execute parts of the work packages and will be coordinated by those responsible for each work package element. The UC OZ acts as an advisory group to the project coordinator, project leaders and portfolio holders involved in this action line. Progress will be reported to the program steering group.

The portfolio holders operations, together with the portfolioholders research will be responsible for the implementation of the code of conduct within the faculties. For the execution of activities regarding scientific integrity, privacy and research data management, the portfolio holders Operations are preparing a claim for policy support to the executive board.

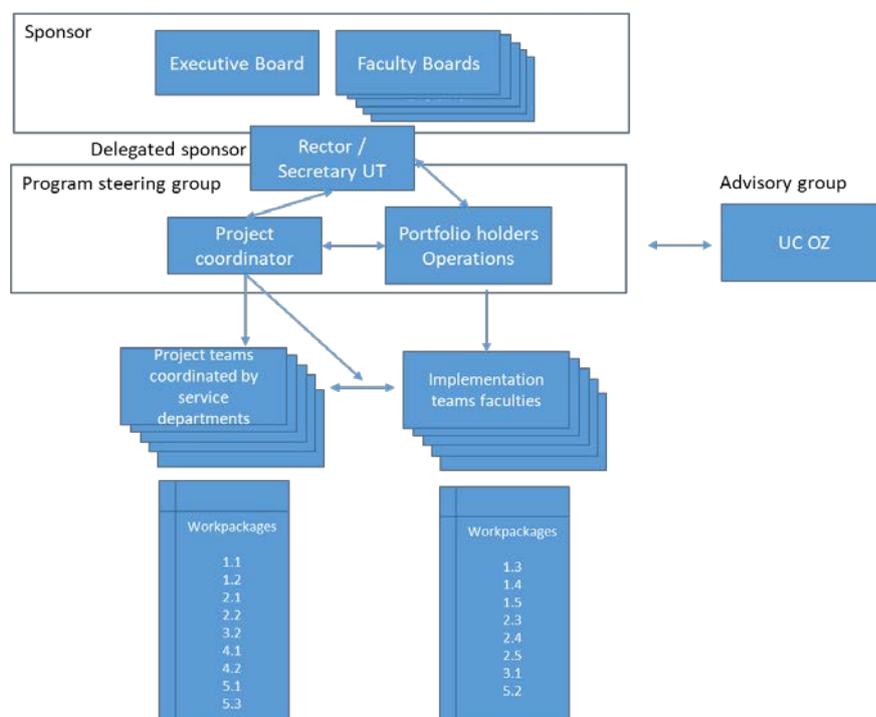


Figure 2: Project management structure action line implementation code of conduct

## 4.2 Action line 2: Organization of integrity policies at the UT

### Introduction action line

Considering the interfaces of various domains of integrity the creation of a house of integrity was proposed as a conceptual perspective to further integrity policies at the UT. JA@UT proposed a number of actions to improve integrity policies at the UT which included this perspective. Some of the proposed actions are already initiated such as the development of a website containing all integrity policies (<https://www.utwente.nl/en/organization/about/integrity/>) and the assessment of regulations and complaint procedures as part of a preparatory action to introduce an 'Ombudsperson' at the UT. This action line proposes a number of actions to further explore and develop the idea of a house of integrity. It formulates results and allocates responsibilities.

### Objectives of the action line

The action plan is organized as a temporary project to develop the foundation for a more integrated set of integrity policies. Main objectives of the action line are:

- Further explore and develop the idea of a house of integrity via the creation of a coordinating group of interested UT colleagues; and
- Stimulate awareness of all integrity policies at the UT amongst the UT employees and students

After the end of this project it is recommended to evaluate the activities and formulate suggestions for further action for ensuring continuity and continuous improvement.

### Description of the results of the action line

The action plan consists of two work packages which initiate the first steps to build a house of integrity. The main features of the work packages are described below. Project schedules are indicative : depending on capacity and priority setting services departments and involved stakeholders.

<b>Work package 1: Organizational structure</b>				
	Responsibilities for integrity policies and their implementation are currently distributed across the UT. This work package proposes the development of an organizational structure to improve coherence and harmonization across the various integrity policies.			
	<b>Description of results</b>	<b>Criteria</b>	<b>Responsible</b>	<b>Draft Schedule</b>
1.1	Exploration of integrity officer function at UT via: interviews with stakeholders (complaint committees, confidential advisors, EB and Faculty Boards).	Proposal offered at executive board and discussed with faculty boards	HR	2019-2020
1.2	Establishment of integrity committee (task: coordination and development of all integrity policies)	Members from faculties and service departments appointed + description of role and task of the committee	HR	2019-2020
1.3	Assessment of regulations at UT and development of action plan as part of preparatory research on behalf of ombuds pilot.	Report accepted by executive board	HR	2019

<b>Work package 2: Integration of integrity policies</b>				
	This work package aims at increasing awareness of (all) integrity regulations for UT employees and students. As such it supports and adds to actions already initiated in action line 1 (e.g. work package on research culture).			
	<b>Description of results</b>	<b>Criteria</b>	<b>Responsible</b>	<b>Draft Schedule</b>
2.1	Further development of website on integrity as central platform for information and publication of integrity policies.	Integration of all integrity policies (research, social, business, education) at one website	M&C (Lankhaar)	2019
2.2	New UT code of ethics	Up-to-date code which contains all integrity policies at UT and is accepted by Executive Board,	HR (Baars)	2019-2020

Work package 2: Integration of integrity policies				
		Faculty Boards and University council.		
2.3	General invitation of signing of UT code of ethics and supported by communication	> 75% of UT employees	HR (Baars)	2020
2.4	Signing of UT Code of Conduct at appointment.	>100% of new employees since March 2020	HR (Baars)	2020

### Project structure of the action line

The executive board and the faculty boards act as sponsor for the implementation of this line of action. The action line is coordinated by the HR department. Progress will be reported to the executive board.

## 4.3 Capacity and budget proposal for execution of the action lines

Execution of the proposed actions in the action lines and communication thereof will require effort from service departments and the faculties. To support decision making regarding the proposed actions, an assessment of hours and budget as well as requested resources was made in figure 1.

### N.B. FIRST ESTIMATES

Action line	WP	Task description	Coordinator*	ESTIMATES				CLAIMS FOR ADDITIONAL RESOURCES				TERM
				Sum Hours	Hours Services	Hours Faculties	Budget	Sum Claim hours	Claim Hours Services	Claim Hours Faculties	Claim budget	
	0	Coordination of all projects, reporting and advising EB-Deans	AZ	700	700		€ 2.500	700	700		€ 100.000	sept2019-dec2020
	1.1	course junior staff	HR	250		250		0			€ 25.000	1 year
	1.2	course senior staff	HR	250		250		0			€ 25.000	1 year
	1.3	Promotion course junior staff	Faculties	60		60		0			tbd	1 year
	1.4	Promotion course senior staff	Faculties	60		60		0			tbd	1 year
	1.5	Education Research integrity BSc/MSc	Faculties	1700		1700		0			tbd	1 year
	2.1	Signing code at appointment	HR	10		10		0			tbd	Ongoing
	2.2	Invitation signing code of conduct	HR	10		10		0			tbd	1 year
	2.3	Promotion signing code of Conduct	Faculties	120		120		0			tbd	1 year
	2.4	Discussion meetings Faculty	Faculties	360		360	€ 3.000	0			tbd	1 year
	2.4	Discussion meetings Group	Faculties	800		800	€ 1.500	0			tbd	1 year
	3.1	Implementation and Support RDM	Faculties	8283	3033	5250		8283	3033	5250	€ 400.000	sept2019-dec2020
	3.2	Development ICT tools RDM (GDPR, RDM, Research Ethics)	LISA				€ 70.000				€ 70.000	1 year + possibility for extension
	4.1	Guidelines IP, FAIR DATA with contracts	GA / LISA	96		96		0			tbd	1 year
	4.2	Guidelines communication of results	M&C	40	40			0			tbd	1 year
	5.1	Development research ethics policy	SP	52	20	32		0			€ 0	1 year
	5.2	Implementation research ethics plicy	Faculties	2800		2800	€ 5.000	0			tbd	Ongoing
	5.3	Revision complaints procedure	SP	108	60	48		0			€ 0	1 year
Organization Integrity policies UT	1.1	Exploration integrity officer	HR	500		500		0			€ 50.000	1 year
	1.2	Establishment integrity committee	HR	30		30		0			tbd	ongoing
	1.3	Assessment regulations UT + action plan	HR	100		100		0			tbd	1 year
	2.1	New website integrity	HR	0				0			tbd	1 year
	2.2	New UT code of Ethics	HR	150		150		0			tbd	1 year
	2.3	Invitation signing code of ethics	HR	10		10		0			tbd	1 year
	2.4	Signing new UT code of ethics at appointment	HR	10		10		0			tbd	ongoing
Communication		Communication plan	M&C	184	184		€ 28.500	0			€ 28.500	1 year
		Total estimated hours		16683	4037	12646			3733	5250		
		Total estimated budget		€ 110.500								
		Total claimed hours		8283								
		Total claimed budget		€ 698.500								

\*: coordinator is responsible for result of the subproject. Projectteam consists of members of service departments and/or faculties.

Figure 1: Estimated hours and budget for implementation integrity actions

## APPENDIX 1: Policy developments regarding integrity

### 1.1 New codes of conduct research integrity

In several countries including the Netherlands, new codes of conduct have been developed regarding scientific integrity. In 2017, ALLLEA (All European Academies) has launched a new code of conduct in collaboration with the European Commission. In October 2018, the new Netherlands Code of Conduct for Research Integrity was launched.

A major difference between the new ALLEA and Netherlands code of conduct and previous codes is the operationalization of high level principles such as honesty, scrupulousness, transparency, independence and responsibility. The Netherlands code of conduct specifies 61 norms, or standards of practice covering the full research cycle from idea to publication. A second major difference between the new ALLEA and Netherlands code of conduct and previous codes is the introduction of duties of care for institutions: Institutions have to establish or, if necessary, improve prerequisites for scientific integrity. Responsibility for scientific integrity is no longer a sole responsibility of scientists, but is also an obligation for knowledge institutions. The Netherlands code of conduct specifies a number of duties: Training and supervision, Research culture, Data management, Publication and dissemination (of data), Ethical norms and procedures.

### 1.2 Observations and recommendations Young Academy University of Twente

The Young Academy (JA@UT) has written an advisory memorandum on the topic of integrity. JA@UT noted that many researchers are not aware of the regulations and signaled that information on codes and regulations are not easy to find. In their report JA@UT found the current UT code of ethics not very effective and perceived that regulations and procedures at the UT could benefit from harmonization and clarification. More generally, the JA@UT noted that the UT, as many other universities, sharply differentiates between several forms of integrity and related target groups. They argue for a more holistic approach towards integrity and for the improvement as well as harmonization of integrity policies and procedures, particularly those relating to complaints about misconduct.

### 1.3 Report Arbeidsinspectie

Following an audit, in 2018 the labour inspectorate concluded that the measures by the UT relating to the prevention of and dealing with aggression and violence fell short. The UT updated its policies and practices enabling it to meet all demands by:

- 1) Introducing a registration form that is used by stakeholders who might receive reports about aggression and violence including confidential advisors, student advisors, student deans, HR managers & advisors, general practitioners, medical officers and campus security. These stakeholders send once a year an overview to HR central for an overall analysis.
- 2) The aforementioned contributes to a better insight into the occurrence of aggression and violence. Moreover, the well-being research (data collection finished 25 February 2019) includes questions about being a victim or witness of unacceptable .
- 3) A revised code of conduct on (un)acceptable behaviour and an aggression protocol have been introduced. Both are approved by the UT executive board and representative participation bodies (UR and OPUT). Compared to the old code (2000) the current code is more strict as shown by two prohibitive clauses.
- 4) From 2018 onwards the UT community receives continuous information about aggression and violence related measures by UToday and the employee portal. Moreover, several thematic discussions and panels for employees and students have been organized aiming to provide better information about how the UT deals with the subject. Employees from the services HR, M&C and S&B have designed an 'Integrity@UT website' where all information (codes of conducts, complaints procedures, support & aftercare, etc.) has been bundled. The site will be officially launched in the second quartile of 2019. Finally, the UT invests in training against aggression and violence. In January and February 2019, 300 UT employees and students received an 'Active Bystander Training'. In April 2019, 60 UT employees (including, for example, supervisors, student advisors, BHV, security, etc.) and student representatives

have received a 'Mental Health First Aid' training. Such a training is also important in the context of dealing with aggression and violence. After all, many of those who are a victim or witness of such unacceptable behaviour suffer from mental health problems.

As a matter of fact, the UT did more for improving policies and practices concerning aggression and violence than the labour inspectorate demanded. While the labour inspectorate's focus is solely on employee wellbeing, the UT wants to provide a safe environment for everybody, thus also including students, guests and visitors. Therefore, the UTs approach can be described as holistic since improved policies, procedures and practices includes everyone who is somehow related to the university.

#### 1.4 Pilot 'ombudsperson'

This more inclusive approach is also visible by the UT's participation in a '*Pilot Ombudsperson*' for employees and students. Employers and unions agreed upon such a pilot for at least three Dutch universities. The pilot is taking place from 1 October 2018 until 1 October 2020. Besides the UT, the EUR, TUD and MA participate in the pilot. Although an ombudsperson should be an easy accessible institution for all kind of employee and student questions and grievances, he or she can also play a vital role in aggression and violence issues by listening, advising, mediating and investigating. As of December 2018, a team of external experts prepares the inauguration of the ombudsperson in June/July 2019. The team works on the following prerequisites for an appropriately functioning ombudsperson:

- 1) Analyzing the current UT network of rules, procedures and officials in which the Ombudsperson will be placed and has to operate;
- 2) Interviews with important stakeholders from the central and local levels (faculty directors, faculty council members, UR, OPUT, scientific directors, confidentiality advisors, student union representatives, student deans, etc.) for creating organization-wide support and getting information on perceptions related to, for example, needs, trends, challenges, current shortcomings and so on;
- 3) Supporting the recruitment and selection of an Ombudsperson that meets the specific UT demands; and
- 4) Creating a code/protocol that specifies the tasks and authorities of the Ombudsperson.

#### 1.5 Audit Governance, Risk and Compliance

In March 2019 the audit committee Governance, Risk and Compliance published their report with findings and recommendations on risk management and compliance regarding the GDPR, code of conduct research integrity, ancillary activities at the UT. Regarding scientific integrity the committee observed that: employees are not of hardly aware of the new code of conduct or the confidential advisors scientific integrity; employees experience a barrier to approach the confidential advisors, do not know how to report, discuss dilemmas or incidents regarding scientific integrity. The committee further noted that there currently is no single system for research data storage management and that there exist relatively more risks regarding scientific integrity with external PHDs. The committee formulated a number of recommendations:

- Communication of the new code of conduct via sessions;
- Improvement of employees familiarity with the complaint procedure scientific integrity;
- Incorporation of a map where to find contact persons regarding specific complaints;
- Consider appointment of a contact person in addition to the confidential advisor to discuss dilemmas;
- Improve effectiveness of communication regarding scientific integrity;
- Develop dilemma courses for employees (including supervisors) to improve discussion and awareness;
- Train employees in providing and receiving feedback;
- Implement one system of research data management;
- Identify indicators for increased risk on reputation damage, and develop policy and procedures to manage these risks.

## APPENDIX 2 : Communication plan

### Communicatieplan Integriteitsbeleid op de UT

#### CONTEXT

##### **Wetenschappelijke Integriteit en zorgplichten universiteit**

Wetenschappelijk integriteit is inherent aan het beoefenen van wetenschap en is vanzelfsprekend een voortdurend aandachtspunt binnen de Universiteit Twente. Sinds 2004 bestaat er een Nederlandse Gedragscode Wetenschapsbeoefening. Deze is onlangs hernieuwd: [Nederlandse gedragscode wetenschappelijke integriteit](#), door alle universiteiten onderschreven en vanaf 1 oktober 2018 van kracht.

Het is belangrijk dat onderzoekers kunnen werken in een open, veilige en inclusieve onderzoekscultuur. Als universiteit hebben we een verantwoordelijkheid voor het creëren van een werkomgeving waarbinnen goede onderzoekspraktijken worden bevorderd en geborgd. In de code zijn daarom zorgplichten voor de instelling geformuleerd. Dit betekent onder andere dat we in de opleidingen voor studenten en onderzoekers systematisch aandacht besteden aan de correcte manier van onderzoek doen. Voor sociale integriteit (agressie en geweld) bestaan al langer zorgplichten voor de instelling.

##### **Maatschappelijke ontwikkelingen en sociale integriteit**

Recente ontwikkelingen maken organisaties nog sterker bewust van het belang om waarden en normen met elkaar na te leven, die een veilige leef- en werksfeer waarborgen. Denk aan de MeToo beweging, de rol van de arbeidsinspectie, de verplichtingen die voortvloeien uit de Arbo-Wet (Risico Inventarisatie en Evaluatie, RI&E) en overige ontwikkelingen op het gebied van grensoverschrijdend gedrag. Het is van belang dat medewerkers en studenten van de UT weten waar ze terecht kunnen, wat hun rechten en plichten zijn en welke procedures er zijn binnen de UT die men kan volgen in geval van klachten, onheuse bejegening of andere vormen van onwenselijk gedrag. We scharen dit onder *sociale integriteit*. De eerder genoemde zorgplicht van werkgevers geldt ook voor deze vorm van integriteit.

##### **Zakelijke integriteit en relatie tot governance, risk en compliance**

Governance, risk en compliance (GRC) is een verzameling aan processen en werkwijzen over verschillende afdelingen en functies waarmee op betrouwbare wijze de doelstellingen van de organisaties behaald kunnen worden, onzekerheden aangekaart kunnen worden en de organisatie in staat stelt integer te handelen. Informatiebeveiliging en ethiek in bedrijfsvoering vormen hier onderdeel van. We plaatsen dit onder *zakelijke integriteit*.

Onlangs is in het kader van GRC een aantal aanbevelingen gedaan voor de UT die tevens raken aan zakelijke integriteit, zoals het stimuleren van een cultuur waarin dilemma's open en veilig besproken kunnen worden, waarbij elementen als laagdrempeligheid en helderheid in regelgeving/procedures, één loketfunctie e.d. als essentieel zijn benoemd.

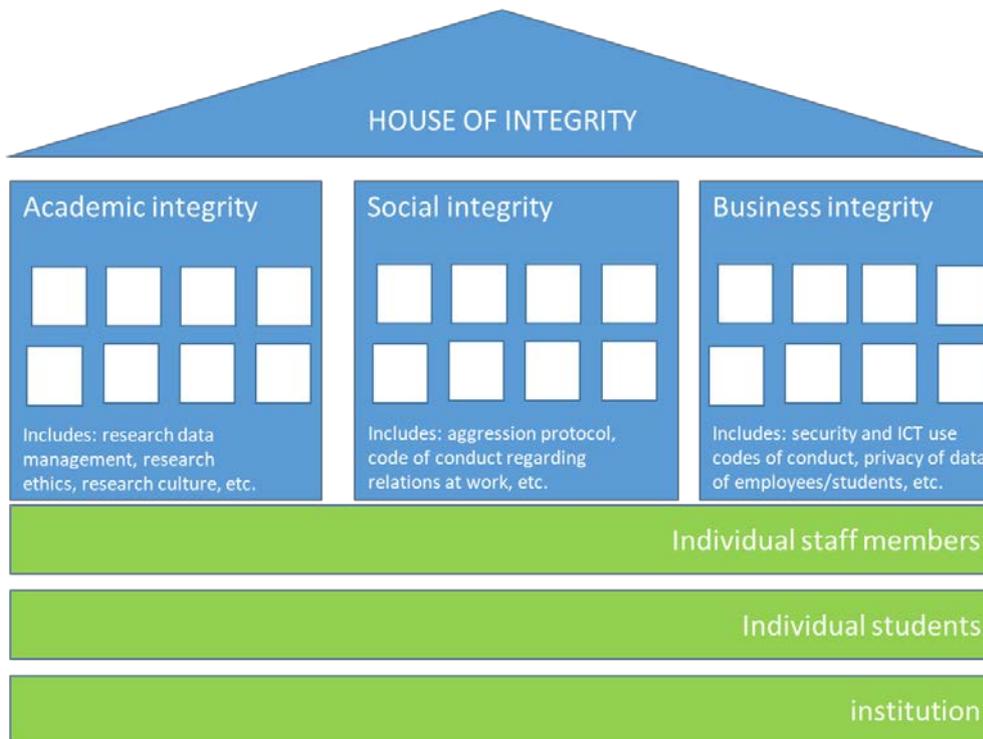
##### **House of Integrity**

Op UT breed niveau hebben we dus te maken met drie vormen van integriteit: wetenschappelijke integriteit, sociale integriteit en zakelijke integriteit.

Mede op advies van de Jonge Academie@UT (JA@UT) wil de UT toe naar een integrale benadering

van integriteitsbeleid met een duidelijke informatievoorziening, onder de noemer House of Integrity. (Zie ook beleidsplan: Integrity policies at the University of Twente, 30 januari 2019.

De afbeelding hierna geeft de verdeling van de ethische thema's in House of Integrity weer:



## ORGANISATIE DOELSTELLINGEN

### Een veilige werkomgeving voor iedereen.

Daarnaast worden de volgende subdoelstellingen genoemd:

1. Zichtbaar en makkelijk vindbaar maken van alle informatie en regelingen rondom integriteit aan UT-gemeenschap.
2. Bewustwording creëren voor rechten en plichten m.b.t. wetenschappelijk integriteit onder wetenschappelijke staf.
3. Vergroten bewustzijn bestaan van integriteitsregelingen voor UT-medewerkers en -studenten.
4. Ontwikkelen van diensten en instrumenten om UT-onderzoekers te ondersteunen bij het voldoen aan (ethische) normen en standaarden zoals gespecificeerd in de Nederlandse gedragscode wetenschappelijke integriteit.

## WELKE (COMMUNICATIE) ACTIES ZIJN ER REEDS UITGEZET?

- Nieuwe Nederlandse gedragscode is gelanceerd en gecommuniceerd
- [Website Integriteit](#) is opgezet. Op deze pagina is alle informatie gebundeld op het gebied van integriteit binnen de Universiteit Twente voor zowel studenten als medewerkers. (regelingen, klachtenprocedure, ondersteuning en nazorg etc.)
- 'Active Bystander Training' training is georganiseerd om bewustwording te creëren voor integer en niet-integer gedrag en hoe met (wetenschappelijke) integriteit om te gaan

## COMMUNICATIE BIJDRAGE

Vanuit communicatie kunnen we bijdragen aan de volgende aspecten:

- Goede vindbaarheid van alle integriteitsregelingen.
- Bevorderen van integriteitsbewustzijn en –cultuur van de UT community (awareness).
- Informatievoorziening lijnmanagement dat hen outilleert hun (voorbeeld)rol te vervullen.

### **Communicatiedoelstellingen:**

1. Lijnmanagement beschikt over de juiste informatie, tools en regelingen om hun teams hierin te begeleiden, sturen, helpen, faciliteren, corrigeren, om voorbeeldgedrag te stimuleren, zelfbewustzijn/zelfreflectie te stimuleren.
2. UT gemeenschap is op de hoogte van de verschillende integriteitsregelingen en weet deze te vinden.
3. Wetenschappelijke staf en studenten (BSc, MSc, PhD's) weten de diensten en instrumenten te vinden die hen kunnen ondersteunen bij het voldoen aan (ethische) normen en standaarden en kennen de inhoud van de nieuwe Nederlandse gedragscode wetenschappelijke integriteit.

### **Key spelers:**

*(met specifieke rol in stimuleren van een open cultuur in house of integrity, communicatiedoel 1)*

- CvB
- Rector Magnificus, specifiek in geval van wetenschappelijke integriteit
- Faculteitsbesturen
- Alle leidinggevenden
- Medezeggenschap (URaad, OPUT, Faculteitsraden)
- Vertrouwenspersonen
- Leden van klachtencommissies
- CvB-D
- UCB
- De Jonge Academie@UT
- Twente Graduate School  
Hoogleraren, clusterleiders, vakgroepvoorzitters  
Student Union en Besturen van studieverenigingen
- KickIn commissie t.b.v. integriteit rondom de introductietijd specifiek

### **Meest betrokken:**

- UT medewerkers algemeen *(Communicatiedoelen 2)*
- Wetenschappelijk Personeel *(Communicatiedoelen 2 en 3)*
- Promovendi *(Communicatiedoelen 2 en 3)*
- UT studenten BSc en MSc *(Communicatiedoelen 2 en 3, specifiek aandacht voor student gerelateerde regelingen en ondersteuning)*

### **Overig:**

- UToday
- VSNU en overige aan kennisinstellingen gelieerde organisaties (KNAW, NWO etc.)
- Algemene publiek

## **KERNBOODSCHAP**

De UT wil een veilige werkomgeving voor iedereen. Integriteit speelt hierbij een belangrijke rol. De UT heeft hiervoor integraal beleid opgesteld. De (minimale) zorgplicht op het gebied van

wetenschappelijke integriteit benadrukken. Diverse stappen die worden genomen om naleving van regelingen en bevorderen van openheid in dilemma-besprekingen.

## COMMUNICATIESTRATEGIE

- De communicatie over House of Integrity is vanuit centraal niveau primair zendergericht. Het gaat om het verstrekken van heldere informatie, vanuit één online integriteitsplatform met daarop alle originele informatie over integriteit / house of integrity (waarbij moet worden voorkomen dat men verwijderd raakt van het basisplatform bij doorklikken.)
- Lijncommunicatie gericht op het outilleren van leidinggevenden om dilemma's bespreekbaar te maken en om voorbeeldgedrag te bevorderen
- Communicatie vindt plaats in fases:
  - o Actielijn 1 (gaat over wetenschappelijke integriteit en is gericht op heldere kennisgeving over de Nederlandse Gedragscode wetenschappelijke integriteit).
  - o Actielijn 2 (gaat over House of Integrity dat we aan het bouwen zijn, visualiseren wat we hebben, waar we naartoe gaan)
  - o Subonderwerpen House of Integrity in de organisatie introduceren vanuit de paraplu House of Integrity (zoals ombudsman pilot, research ethics policy, actualisatie gedragscodes, etc.)
  - o Inspelen op Week van de integriteit (december 2019)
- Awareness campagne House of Integrity: online en offline middelen elkaar laten versterken: Kick off met een mailing, gecombineerd met berichten op de portals, slides op beeldschermen, soort van flyer of boekenlegger/keycord of andere give-away, social media, UToday interview, leidinggevenden vragen te agenderen in reguliere overleggen.
- Interne communicatie vóór externe communicatie (UToday is externe communicatie, evenals social media).

## COMMUNICATIEMIDDELEN

	Medewerkers UT	UT lijnmanagement	WP specifiek	Promovendi specifiek	Studenten UT	Externen
<a href="http://www.utwente.nl/integrity">www.utwente.nl/integrity</a> als basisplatform voor alle originele info	x	x	x	x	x	x
UT website publieke berichtgeving	x	x			x	x
Social mediakanalen UT	x				x	x
Persoonlijke mailings vanuit CvB opgemaakt in de Shaping2030 huisstijl	x	x	x	x	x	
Medewerkersportal	x					
TGS news				x		
TGS introductiebijeenkomst nieuwe PhD's				x		

	Medewerkers UT	UT lijnmanagement	WP specifiek	Promovendi specifiek	Studenten UT	Externen
Introductiebijeenkomsten nieuwe medewerkers	x					
Student portal en newsmail					x	
<a href="#">Mailings via Organisation Study Associations</a>					x	
Powerpoint presentative / toolkit leidinggevenden*		x				
Attentie slides voor beeldschermen gebouwen	x		x	x	x	
<i>Optioneel:</i> Banners in gebouwen O&O plein	x		x	x	x	
<i>Optioneel:</i> Flyers	x		x	x	x	
<i>Optioneel, aan te bevelen:</i> Instructievideo	x		x	x	x	
UToday (persberichten, interviews)	x	x			x	x

\*Specifieke behoefte leidinggevenden onderzoeken

## COMMUNICATIE ACTIE EN PLANNING

WAT	WANNEER	DOELGROEP	DOOR WIE	OPMERKINGEN
Mailing Rector over Ned. Gedragscode + link online platform bekend maken		WP Studenten BSc, MSc Promovendi	Rector Beryl Lankhaar / Haico te Kulve	Eerst leidinggevenden in WP berichten incl. verwachting rector over hun rol (Faculteitsbesturen, Hoogleraren/promotoren, TGS directeur, Clusterleiders).  Incl. bericht over research ethics policy en de projectorganisatie die zich met ethics bezighoudt.
Instructievideo House of Integrity		UT community	CvB	Á la NOS instructiefilmpjes  Online platform mede onder aandacht brengen.  Uitzenden via alle kanalen.
Interview CvB over House of Integrity		UT community	Rector over w.i. Vice-voorzitter over sociale- en	

		Externen	zakelijke integriteit	
Overzicht / toolkit met de zorgplichten w.i.		Lijnmanagement WP	Haico te Kulve? Saloa Omari	
Alle originele informatie House of Integrity op één platform plaatsen		UT community	Saloa Omari + Online Media M&C?	Zorgen dat men niet meer van het basisplatform <a href="http://www.utwente.nl/integrity">www.utwente.nl/integrity</a> verwijderd raakt.  Alle info over de vijf programma's zorgplichten w.i. opnemen (trainingsmogelijkheden, link naar RDM en Open Access, Guidelines publications en wetenschapscommunicatie) Actuele gedragscodes.  Opdelen in doelgroepen: medewerkers algemeen, WP, Student.  Projectstructuur/organisatie.  Facultaire ethische commissies.
Toolkit leidinggevenden			Saloa Omari + Haico te Kulve + Nicole Torka + ?	Nagaan wat heeft men nodig (powerpoint met alle info, dilemmaspel, studiemogelijkheden, gespreksmethoden voor dilemmabesprekingen....).
Programma introductie TGS		Nieuwe PhD's	Paul van Dijk + Saloa Omari	
On- en offline middelen met verwijzing naar online platform		UT community	Bertyl Lankhaar + Saloa Omari	Gericht op awareness en weten waar info te vinden is. Alle kanalen inzetten.
Pilot ombudsman Persbericht / interview UToday			Bertyl Lankhaar + Nicole Torka,  Vice voorzitter CvB	Intern berichtgeving eerst naar lijnmanagement  Daarna op site, portals en social media
Integriteits-Functionaris / integriteitscommissie Persbericht / interview UToday			Nicole Torka?	Rol commissie toelichten
Landelijke Week van Integriteit				Gericht op awareness  Best practice delen?  Dilemmaspel doen?  Give aways

Nieuwe code of ethics introduceren			Bertyl Lankhaar + Saloa Omari	Afhankelijk van verschillen evt. interne berichtgeving + op platform plaatsen, aanvullen met UToday interview
Gesprekken kamers van hoogleraren		WP	Rector	
Gesprekken met besturen SU en Studieverenigingen			CvB	

## COMMUNICATIE ONDERSTEUNING EN FINANCIËLE PARAGRAAF

Bertyl Lankhaar en Saloa Omari ondersteunen communicatieontwikkelingen op het gebied van integriteit.

Voor het onderhoud en beheer van het online platform dient een aparte functionaris te worden aangewezen, die de projectcoördinator van House of Integrity hierbij ondersteunt.

Structuur en opmaak worden door M&C wel ondersteund, maar het actueel houden niet.

Beschikbaarheid: ieder max. twee uur per week. Dus 0,5 dag per week ondersteuning in totaal.

### ***Inschatting kosten:***

Vertaalkosten NL- ENG (teksten á 1000 woorden á €0,18 per woord, uitgaande van max. 10 berichten op jaarbasis plus Info website)	€2.500
Productie offline middelen (ca. €100 per middel aan opmaakkosten + drukwerk*)	€1.000
Give away medewerkers (nice to have in awareness campagne)	€10.000
Productie instructievideo	€15.000
<b><i>Totaal geschat te maken kosten</i></b>	<b>€28.500</b>

*\*Banners €69 per stuk / flyers, A5 dubbelzijdig 1000 stuks € 175,-) / give away start bij €2,50 per stuk, dan alleen voor specifieke doelgroep inzetten om kosten beperkt te houden, ondersteunt awareness campagne*