

Academic Integrity Complaints Regulations for Universities of the Arts

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Preamble

The Netherlands Code of Conduct for Research Integrity

Within the Netherlands Association of Universities of Applied Sciences (VH), the board decided that the Netherlands Code of Conduct for Research Integrity (NGWI, Oct 2018) would be implemented at all universities of applied sciences. This code of conduct was drawn up by the Committee for the Revision of the Netherlands Code of Conduct for Academic Integrity, at the request of the boards of the KNAW, NWO, NFU, TO2 federation, VSNU and VH¹.

This code replaces the 'Code of Conduct Applied Research for Higher Professional Education' (VH, 2010) and the 'Netherlands Code of Conduct for Academic Practice' (VSNU, 2004) for university research.

The new code of conduct formulates five widely supported principles that form the basis of practicing integrity in research: honesty, scrupulousness, transparency, independence and responsibility. These principles are further specified in more concrete standards for good research practices, which must be complied with by researchers and other parties involved in the research. They are formulated for each phase of the research process: design, conduct, reporting results, assessment and peer review, and communication.

Collective Academic Integrity Committee in art education

One essential condition for integrity in research is attention to a working environment in which good research practices are both promoted and safeguarded. By implementing the code of conduct, the universities commit themselves to a number of duties of care. One of those is to regulate a committee or official for handling complaints. If someone suspects that one or more standards are not being complied with, an executive board must ensure that this is investigated with integrity, honesty and expertise. A complaint about academic integrity can, after all, have a big impact on both the complainant and the researcher against whom the complaint is lodged. Also in the interests of the image of the university in question and that of art education in general, it is important to be scrupulous.

The executive boards of the universities of the arts stated below have decided to address this duty of care collectively and set up a collective Academic Integrity Committee for art education. We think that this collaboration will lead to a shared research culture and responsibility, and will ensure continuity. It will also enable good and broad representation of expertise in the area of practice-based research in the arts. This is even more important when that research leads to a complaint about the violation of academic integrity.

¹ The Royal Netherlands Academy of Arts and Sciences (KNAW), the Netherlands Organisation for Scientific Research (NWO), the Netherlands Federation of University Medical Centres (NFU), Associated Applied Research Institutes (TO2 federation), the Association of Universities in the Netherlands (VSNU) and the Netherlands Association of Universities of Applied Sciences (VH).

The following *Academic Integrity Complaints Regulations* serve as a collective basis. The complaints procedure is based on the NGWI, also using the *Complaints Procedure Model* (Oct 2019) drawn up by the VH and the *National Model for Complaints Regulations concerning Academic Integrity* by the VSNU. A draft version of the procedure, drawn up by HKU, has been discussed with all the affiliated universities of the arts and subsequently revised.

A culture of academic integrity

Forming an Academic Integrity Committee –popularly known as ‘the complaints committee’ – is the last step in a long process. The aim is to prevent complaints, to safeguard an open, safe research culture and to create an automatic awareness of academic integrity, through training and supervision, for example. The code of conduct provides a methodological and ethical framework of standards that is widely supported and is taught, consulted and applied. Other duties of care stated in the code of conduct are supportive of such a culture. For instance, the university is requested to facilitate ethical testing and advice, to ensure good data management and to appoint one or more easily accessible confidential counsellors for academic integrity.

The universities of the arts stated below have each decided to appoint one or more of their own confidential counsellors for academic integrity. This means that the confidential counsellor is embedded in the university’s own environment and is at low-threshold proximity to the students, lecturers and researchers. Articles relating to the confidential counsellor for academic integrity are therefore not included in these regulations, contrary to the VH and VSNU models.

Agreed on 1 June 2021 by the Executive Boards of the 7 mono-sectoral universities of the arts¹:

Amsterdam University of the Arts
ArtEZ University of the Arts
Codarts Rotterdam
Design Academy Eindhoven
Gerrit Rietveld Academie
University of the Arts The Hague
HKU University of the Arts Utrecht

¹ See Appendix

1 Definitions

Code	De Netherlands Code of Conduct for Research Integrity 2018 (NGWI).
Committee	The Academic Integrity Committee appointed by the collective executive boards, which is responsible for handling complaints regarding suspected violation of academic integrity.
Complainant	The person who lodges a complaint with the committee.
Complaint	A written report of a suspected violation of academic integrity.
Executive Board	The executive board of the university where the suspected violation of academic integrity has taken place, except in cases where it is clear that the term executive board is used in a general meaning.
Respondent	<p>The person who has had a complaint lodged against their conduct, or who is undergoing an investigation into their actions by the committee at the request of the executive board. If the complaint concerns a group of researchers, it is defined as the researcher or other person who holds responsibility for the group.</p> <p>The respondent may also be someone who no longer works at or for one of the universities concerned.</p> <p>Code 1.3 is applicable. (See appendix)</p>
Violation of academic integrity	Non-compliance with one or more of the standards set out in § 3 of the code, which leads to a violation of academic integrity as set out in § 5.2 under A 1, 2 or 3 of the code.

2 Complaint

2.1 Complaint

A complaint can only be lodged about a suspected violation of academic integrity. Chapter 5 of the code is applicable.

2.2 Procedure

Anyone who suspects a violation of academic integrity is entitled to report the suspected violation to the committee. The procedure set out in these regulations is then followed.

This procedure is also followed if the executive board itself, separately from a complaint or report, deems it necessary to investigate a possible violation of academic integrity.

3 Academic Integrity Committee

3.1 Foundation

The executive boards of the 7 mono-sectoral universities of the arts set up a collective Academic Integrity Committee.

3.2 Composition and appointment

- a. The executive board of each university appoints one member.
- b. The members are appointed for a period of four years, whereby appointment for a further period of four years is possible each time.
- c. The composition of the committee aims for a balanced representation of the academic areas of the universities concerned.
- d. The executive board is entitled to add one or more independent external experts to the committee for investigating and handling a complaint, whether or not at the request of the committee.

3.3 Chair

- a. The members of the committee select a chair and deputy chair from their midst. The deputy chair acts for the chair in the absence of the chair. Both parties endorse the intention to hold the position in the long term.
- b. The chair:
 - prepares, along with the secretary, the meetings of the committee and directs the secretary in other matters as well,
 - steers the meetings of the committee in the right direction and aims for consensus in the committee's judgements and other decision-making,
 - leads the meetings as referred to in Art 5.2, in which the complainant and respondent give their views on the suspected violation of academic integrity,
 - is authorised to sign on behalf of the committee,
 - represents the committee on occasions that arise,
 - maintains contact with the executive boards of the universities concerned, regarding matters that affect the whole committee or individual members of the committee, and
 - takes responsibility for other matters that affect the good functioning of the committee in general.

3.4 Independence

- a. An appointment as chair or member of the committee is incompatible with membership of the supervisory board, executive board or ethical advice committee, as well as with an appointment as confidential counsellor for academic integrity or an appointment to a management position at one of the universities concerned.
- b. A member of the committee appointed by the university where the suspected complaint is supposed to have taken place will not participate in the handling of the complaint.
- c. In other cases than stated under b, a member who thinks their independence regarding the handling of a complaint may be called into question is entitled to forego participation in the handling of that complaint.
- d. The executive board of the institution where the suspected complaint is supposed to have taken place may call into question the independence of a member of the committee and request the committee to forbid this member to participate in the handling of the complaint. The executive board will give written reasons for its request.

After hearing the member's response to the matter, the other members will decide on the request from the executive board.

3.5 Tasks

- a. The committee investigates complaints about suspected violations of academic integrity, judges whether or not, or to what extent, academic integrity has been violated and advises the executive board on the matter.
- b. At the request of the executive board, the committee can conduct an investigation into a suspected violation of academic integrity and advise on it without a complaint being lodged.
- c. The committee also advises the executive boards of the participating institutions on the university's policy for the prevention of violations of academic integrity, whether by request or unrequested.

3.6 Requirements

The following requirements apply to appointment as a member of the committee:

- an appointment (preferably permanent) as a researcher at the university that appoints the member, without prejudice to the provision in Art 3.2 under d,
- a PhD or registration for a course leading to a PhD at an authorised institution,
- wide experience in research and education, preferably gained in the position of professor at one or more universities or universities of applied science in the Netherlands,
- an irreproachable reputation in education and/or research,
- an affinity with and up-to-date knowledge of the norms and values for conducting research well and with integrity, particularly with regard to the Netherlands Code of Conduct for Research Integrity,

- the ability to form independent judgements (standing above the parties),
- experience in dealing with differences of opinion,
- good communication skills in Dutch and English, particularly discussion skills.

3.7 Powers

The committee has the following powers:

- Obtaining information from all employees and bodies of the university. They are entitled to all documentation and correspondence they deem relevant to investigating and judging the complaint, and where necessary they can seize them, have copies made or place them under seal.
- Hearing or consulting one or more experts. A report will be drawn up of the hearing or consultation with the expert(s), which will be included in the advice given by the committee, following agreement from the expert(s) concerned.
- Hearing or consulting witnesses. A report will be drawn up of the hearing or consultation with the witness, which will be included in the advice given by the committee.

3.8 Methods

- a. The committee commits itself to treating the complainant and respondent with honesty and integrity, and to avoiding any unnecessary harm.
- b. In principle, all the committee members participate in carrying out the tasks stated in Art 3.5, subject to Art 3.4 under b and c, with a minimum number of four members.
- c. Insofar as the methods of the committee are not set out in these or other regulations, they will be determined by the chair.

3.9 Open to the public

The committee's meetings are not open to the public.

3.10 Accountability

The committee will report on its activities to the executive boards of the participating universities afterwards in an annual report. The report covers the cases handled and the activities performed in general terms. The report will in any case give insight into the number of complaints, the number of complaints declared admissible and inadmissible (see Art 4.4), the number of complaints not handled or complaints that ceased to be handled at a certain point (see Art 4.5), and the number of complaints on which the committee has taken a decision, as well as the decision (in accordance with Art 5.3 under a) itself. The report may not be traceable to any persons.

3.11 Secretary

The committee is supported by an official secretary from one of the participating universities. The secretary and the university concerned endorse the intention that the secretary will hold the position in the long term.

3.12 Termination

An executive board may prematurely terminate the membership of the member appointed by that executive board:

- at the request of the member concerned,
- if the member no longer meets the requirements for appointment, or
- if the member is not functioning properly.

4 Handling of complaints

4.1 Anonymous complaints

- a. An anonymous complaint is defined as:
 - a complaint from a complainant whose name is not known, as well as
 - a complaint from a complainant whose name is known to the committee, but who has stated their wish to remain anonymous to other persons.
- b. The committee will present an anonymous complaint to the executive board. The committee will only handle this anonymous complaint if the executive board sees reason to do so, because it judges that:
 - this is prompted by important public interests or important interests of the institute or the respondent, and
 - the investigation of the facts can take place without the input of the complainant.
- c. If the executive board sees no reason for the committee to handle the anonymous complaint, the committee will inform the anonymous complainant of this fact, if possible.

4.2 Information

With a view to honest handling, all relevant information made available to the committee will be shared with all those concerned, unless the committee sees reason to deviate from this rule, on the grounds of important reasons. The reasons for not making certain information available will be stated in a report to the executive board.

4.3 Start of the handling procedure

- a. The committee will inform the complainant and the respondent of receipt of the complaint, in writing, within two weeks of receipt of the complaint, and inform them of the procedure to be followed and about the content of the complaint.

The committee will also inform the respondent of the possibility of providing the committee with information as defence.
- b. The committee will inform the executive board of the fact that a complaint has been lodged.

4.4 Admissibility

- a. Within three weeks of receipt of a complaint, the committee will decide whether it can handle the complaint on the basis of the following requirements:
 - the complaint is dated and states the name, position and contact details of the complainant (this requirement does not apply if Article 4.1 is applicable),
 - NGWI 1.3 is applicable to the complainant,
 - the complaint contains a clear description of the suspected violation of academic integrity,
 - any written documents or other pieces of evidence relating to the complaint are enclosed.

- b. If the complaint is incomplete, the committee will give the complainant the opportunity to complete it within a reasonable period, to be set by the committee. The period referred to under a and in Article 5.3 is then extended by the term referred to in the previous sentence, or by the term within which the complaint has been completed. If the complainant provides additional information, the committee will share this with the respondent and the executive board.
- c. If the committee reaches a conclusion of inadmissibility, it will immediately inform the complainant, the respondent and the executive board of this.
- d. If the committee deems the complaint admissible, it will proceed to the substantive handling of the complaint.

4.5 Refraining from substantive handling

- a. The committee may decide to refrain from or suspend substantive handling as soon as it becomes clear that:
 - the complaint concerns only a professional difference of opinion (methodological discussion, regular academic debate),
 - the complaint derives from a labour dispute,
 - the complaint cannot lead to the judgement that the actions or negligence of the respondent amount to a violation of academic integrity, for example because it is not sufficiently substantiated,
 - the complaint has been investigated previously by the committee or a similar committee, and no new information has become available,
 - in the committee's opinion, too long a period has elapsed since the suspected violation, or the complainant has waited too long to lodge the complaint; as such, a period of at least ten years is applicable in principle,
 - in the committee's opinion, the complaint is not significant enough.
- b. The committee will decide within [four] weeks whether it will proceed to substantive handling of the complaint and will inform the complainant, the respondent and the executive board of this. A decision to refrain from or suspend handling of the complaint is counted as an initial judgement, as referred to in Art 6.1.

5 Substantive handling of complaints

5.1 Innocent

The respondent is deemed innocent until proven to the contrary.

5.2 Hearing

- a. The committee gives the complainant and the respondent the opportunity to be heard. If both parties wish to make use of this opportunity, the hearing takes place in the presence of both parties, unless in the committee's opinion there are important reasons – whether or not put forward by the complainant or the respondent – to hear them separately.
- b. This hearing as part of the substantive handling is not open to the public. The complainant and the respondent may, however, each be assisted by one adviser during the hearing, although they may not be represented by a third party.
- c. A written report will be made of the hearing, which gives an objective statement of what is said. The committee may make audio recordings of the hearing, which are intended solely for helping to write the report. When the executive board has given its final judgement, the recordings will be destroyed. During a hearing, audio recordings may not be made by any other party than the committee.
- d. The complainant and the respondent receive a copy of this report. If they have been heard separately, they also receive a copy of the hearing of the other party. This provision is also applicable if only one party has made use of the opportunity to be heard.

The report is enclosed as an appendix to the committee's advice to the executive board.

5.3 Report

- a. Within twelve weeks of receipt of the complaint, the committee will present a report to the executive board on its findings about the validity of the complaint.
These findings eventually lead to a statement by the committee about the question of whether, and if so to what extent academic integrity has been violated in the committee's opinion. The committee bases its statement on § 5.2 of the code (see appendix).
- b. On the basis of its findings, the committee can then advise the executive board regarding any sanctions to be imposed, subsequent steps to be taken, measures to be taken for preventing violation of academic integrity and any other matters the committee deems necessary. This advice is not included in the report and is not communicated to the complainant and the respondent. (See Art 6.1)
- c. The committee may extend the period of weeks referred to under a by four weeks. All parties concerned will be notified in writing of the extension.

Further extension is possible insofar as the parties concerned agree to it in writing.

6 Further procedure

6.1 Initial judgement

The executive board will issue its initial judgement as soon as possible, but at least within [four] weeks of receipt of the committee's report. In doing so, the board makes use of § 5.3 of the code (see appendix).

The board notifies the complainant and the respondent of this immediately, with a copy to the committee. The report of the committee's findings is enclosed with the initial judgement.

6.2 Second opinion

Within six weeks of the date of the initial judgement, the complainant and the respondent may request a second opinion from the Netherlands Board on Research Integrity (LOWI) with regard to the violation of academic integrity. If requested, the committee will immediately provide the LOWI with copies of all the documents relating to the complaint.

6.3 Final judgement

If a second opinion is not requested from the LOWI within the period stated in Art 6.2, the executive board settles on its final judgement on the complaint.

If a second opinion has been requested from the LOWI, the executive board takes this second opinion into consideration in its final judgement.

6.4 Sanctions and measures

At the same time as issuing its final judgement, the executive board of the institution determines any sanctions or measures as referred to in § 5.3 of the code.

6.5 Announcement

The executive board will immediately notify the complainant and the respondent in writing of the final judgement. If applicable, the second opinion from the LOWI will be enclosed with the final judgement.

The executive board will notify the respondent of the sanctions and, insofar as relevant to the respondent, any other measures the executive board wishes to take.

The executive board will keep the committee fully informed.

6.6 Publication

Subsequently, at least if it has been decided that academic integrity has been violated, the executive board will arrange anonymised publication of the findings and the final judgement, in agreement with the committee.

7 Other provisions

7.1 Corrective measures

If the suspicion of violation of academic integrity turns out to be unfounded, the executive board will take appropriate corrective measures, insofar as required and possible.

7.2 Protection of parties concerned

The executive board will ensure that the rights of the complainant and the respondent will be protected and that the complainant and the respondent do not experience any unnecessary disadvantage in their career prospects or otherwise.

The same applies to any other parties concerned, witnesses, experts, confidential counsellors and members of the committee.

7.3 Legal aid

The executive board is not obliged to arrange legal aid, although it may decide to do so.

7.4 Confidentiality

- a. Everyone involved in the handling of a complaint has a duty of confidentiality with regard to the content of the complaint and the information made known to them in relation to the complaint or the procedure.
- b. This duty of confidentiality also applies after the procedure has ended, with the exception of the anonymised statement of matters in the prescribed publication, the annual reports and suchlike.
- c. If there is a violation of the duty of confidentiality, the committee or the executive board may attach appropriate consequences to it.
If the complainant violates the duty of confidentiality, the committee may decide to refrain from or suspend handling of the complaint
- d. The duty of confidentiality may only be deviated from with the express permission of both the complainant and the respondent.

7.5 Supervisory board

If the complaint relates to a member of the executive board, the supervisory board will take on the role and powers that are laid down for the executive board in these regulations.


7.6 Catch-all provision

In cases not covered by these regulations, decisions will be taken by the executive board or, if occasioned by the complaint, the executive boards with an interest in the case in joint consultation, without prejudice to the provision in Art 3.8 under c of these regulations.


7.7 Final provisions

- a. These regulations come into force on 1 April 2021, replacing any previous complaints regulations in the area of academic integrity. Amendments will be made in mutual agreement with the universities concerned.
- b. Each participating university will publish these regulations on the university's website.

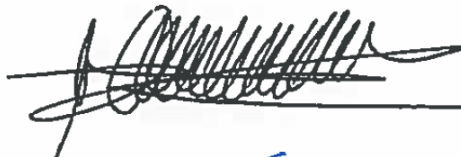
Appendix: Signature



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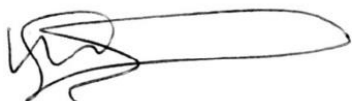


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Appendix: NGWI sections referred to

The following sections (1.3, 5.1, 5.2 and 5.3) from the NGWI are referred to in these Complaints Regulations

1.3 To whom does this code apply within the institutions that have adopted it?

9. Within the institutions that have adopted this code, chapters 2 and 3 apply first and foremost to:
 - individual researchers, including PhD students (whether or not they are employed as such by their university) and visiting researchers, part-time researchers or external professionals insofar as they participate in research by or at the institution or disclose their research in its name;
 - supervisors, principal investigators, research directors and managers insofar as they help determine the design and conduct of research.
10. Chapters 2 and 3 also apply to work of other parties involved in research, such as support staff, students or participating citizens, although only the researchers, principal investigators or research directors on whose instructions or under whose responsibility they work are personally accountable for non-compliance with the standards in this Code.
11. Within an educational setting, this Code is meaningful as an object of study and in training courses. Scientific and scholarly research by students therefore falls within its normative framework (chapters 2 and 3). As long as that research is conducted only in an educational context and does not result in publications other than a published thesis, however, non-compliance with the standards of this Code cannot result in a complaints procedure as described in section 5.4 or in imposing sanctions as described in section 5.3.9
12. Chapter 4 focuses mainly upon the institutions themselves and the officers employed there in a managerial or executive capacity. One of the duties of those institutions and officers is ensuring that researchers comply with the standards in chapter 3.

5.1 Introduction

In this chapter, 'standard' refers to the standards for good research practices listed in chapter 3, including the additional standards for a discipline or institution referred to in section 3.1. 'Assessment criteria' refers to the factors described in section 5.2C.

Researchers, supervisors, principal investigators, research directors, managers and the executive board members of the institution must always strive to ensure that the standards are fulfilled scrupulously. Non-compliance with them undermines professional responsibility, which

harms the research process and the relationship between individual researchers, and possibly also trust in and the credibility of the research.

Section 5.2 provides guidelines for institutional boards and for the committees and officers referred to in section 5.4, under 1, in judging the severity of specific cases of non-compliance with standards, including the assessment criteria to be applied. Section 5.3 deals with measures and sanctions to be imposed, if necessary, and section 5.4 addresses the submission and consideration of complaints about alleged instances of research misconduct.

5.2 Research misconduct, questionable research practices and minor shortcomings

A. Research misconduct

In serious cases, non-compliance with one or more standards constitutes 'research misconduct' on the part of the researcher involved as well as, where applicable, the supervisor, principal investigator, research director or manager who incited that non-compliance.

1. The clearest examples of research misconduct are fabrication, falsification and plagiarism.

Fabrication means the invention of data or research results and reporting them as if they are fact (chapter 3, standard 19).

Falsification Falsification means the manipulation of data or research material, equipment or processes to change, withhold or

remove data or research results without justification (standard 21).

Plagiarism means the use of another person's ideas, work methods, results or texts without appropriate acknowledgement (standards 34, 40). In some cases, however, plagiarism is of such limited extent and significance that its labelling as 'research misconduct' would be excessive.

2. In the event that the following standards are not met, the determination of whether the case in question constitutes 'research misconduct' or a less serious violation will depend on the outcome of an assessment using the criteria as mentioned in section 5.2C:
 - design: standards 7, 8 and 14.
 - conduct: standards 18, 22 and 23.
 - reporting: standards 30, 36, 38, 42, 44 and 45
 - assessment and peer review: standards 47 and 49.
 - communication: standards 53 and 55.
 - general standards: standards 57, 58 and 60
3. Only in exceptional cases is non-compliance with any of the other standards to be characterized, in the light of the assessment criteria, as 'research misconduct'.

B. Questionable research practices and minor shortcomings

In cases where non-compliance with the standards does not constitute 'research misconduct', it may instead be categorized as 'questionable research practice' or, in the least serious situations, as a 'minor shortcoming'. Which of these descriptions is appropriate in any specific case depends upon the outcome of the assessment using the criteria in section 5.2C. In the event of a 'minor shortcoming',

5.3 Sanctions and other measures

If the executive board of the institution suspects non-compliance with one or more standards, it ensures that the case is examined honestly and fairly. If such non-compliance is indeed established after proper investigation, it may be deemed appropriate to impose sanctions or other measures. The nature and extent of these will depend, among other things, upon whether the non-compliance is found to constitute 'research misconduct', a 'questionable research practice' or a 'minor shortcoming'. If the suspicion of non-compliance proves unfounded, appropriate remedial measures are taken.

Sanctions

Whenever 'research misconduct' is established, the board of the institution must consider whether it is possible and desirable to impose sanctions.

in general there will be no reason to impose measures or sanctions as referred to in section 5.3.

C. Assessment criteria

When the executive board of the institution and the committee or officer referred to in section 5.4, under 1 are considering the case, the following criteria are particularly important:

- a. the extent of the non-compliance;
- b. the level to which non-compliance was intentional and whether it was a form of gross negligence or was the result of carelessness or ignorance;
- c. the possible consequences for the validity of the research in question and for the prevailing scientific knowledge and scholarship;
- d. the potential effects on the trust in scientific and scholarly research and between researchers;
- e. the potential impact on individuals, society and the environment;
- f. the potential benefits for the researcher or other interested parties;
- g. whether the matter concerns a scientific or scholarly publication, as opposed to a popularizing article, teaching materials or an advisory report;
- h. opinions within the discipline(s) concerning the severity of the non-compliance;
- i. the researcher's position and experience;
- j. the extent of any prior violations committed by the researcher;
- k. whether the institution itself has failed in its duties of care;
- l. how much time elapsed before action was taken against the non-compliance within or outside the institution.

Naturally, any sanction must always be appropriate and proportionate. In serious cases, the institution has the powers to impose penalties within its legal powers, such as a formal reprimand, transfer, demotion or dismissal.

A person's authorization to supervise degrees may also be suspended. Furthermore, the institution may deem it necessary to report the matter to the relevant regulatory bodies or to authorities empowered to impose other administrative, disciplinary or criminal sanctions.

Other measures

Regardless of whether a sanction ought to be imposed, it is always important to consider whether other appropriate measures are necessary.

This is especially so in the event of repeated non-compliance or more- than-occasional breaches of the standards.

Even when there is no reason to impose sanctions, failure to comply with the standards cannot remain undiscussed. Researchers must always hold each other, their subordinates, their supervisors, principal investigators, research directors and managers accountable, to ensure that quality assurance is improved, that recurrence is prevented and that adverse effects are remedied or mitigated (e.g. by rectifying or retracting

publications). The institution's board should take measures itself or ensure that others do so. In this respect, it may make a difference whether the matter is a case of research misconduct, a questionable research practice or a minor shortcoming. It may also prove necessary for the institution to take preventive individual or general measures to ensure that research practices are improved, compliance with all standards is maintained and timely detection will take place (see also the duties of care described in chapter 4).