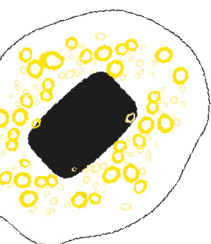
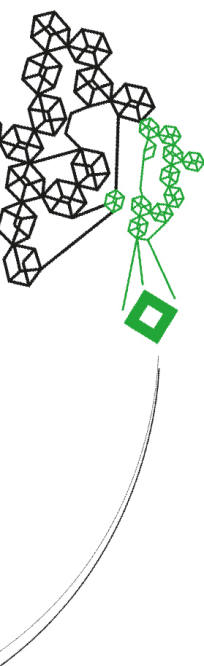
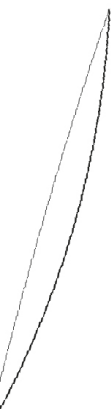


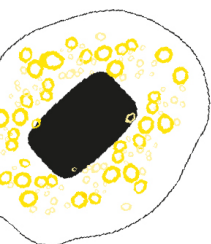
UNIVERSITY OF TWENTE.



SCIENTIFIC INTEGRITY COMMITTEE

Translation of the Dutch version of the  
**Annual Report**  
*September 2024 - August 2025*





## COLOFON

TRANSLATION OF THE DUTCH VERSION OF THE ANNUAL REPORT SCIENTIFIC INTEGRITY COMMITTEE (CWI)  
**CLASSIFICATION: PUBLIC**

SUBJECT  
CWI.2025.083

SERVICE DEPARTMENT INVOLVED  
Strategy & Policy

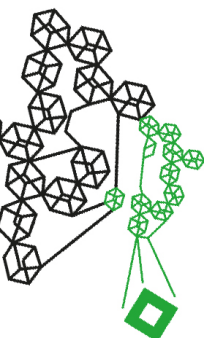
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## Introduction

The Committee on Scientific Integrity (here after CWI/the committee) advises the Executive Board (here after also: CvB) regarding complaints about suspected violations of scientific integrity by (former) employees of the University of Twente. On annual basis, the committee draws up a report of its activities. This report is public and will be published on the [CWI-website](#).

### 1. Annual reporting

According to the UT Scientific Integrity Complaints Procedure (hereinafter: the complaints procedure), the CWI reports on its activities to the Executive Board in a report for the university's annual report. Once approved, the report is published. The Scientific Integrity confidential advisors for complainants and defendants draw up (separate) anonymized annual reports on their activities. These are only shared with the Executive Board and the members of the committee for discussion during the annual meeting and to learn from. Aspects from these reports may be described in broad terms and in anonymous form in this annual report. The CWI, the relevant portfolio holder of the Executive Board, and the confidential advisors for Scientific Integrity meet at least once a year in an annual meeting to discuss CWI cases, the annual reports of the confidential advisors, and possible areas for improvement. That meeting took place on October 14, 2025. In addition to a description of the process and any improvements to it, this report contains an overview of the topics discussed during that meeting, in anonymous form.

### 2. Composition CWI

Composition of the CWI is as follows:

- prof.mr.dr. M.A. (Michiel) Heldeweg, Chair
- prof.dr.ir. L. (Leon) Lefferts, member, and vice chair per May 1st, 2023
- em.prof.dr.ir. P. (Piet) Bergveld, member
- prof.dr.ir. G.J. (Geert) Heijenk, member
- prof.dr. A. (Armagan) Kocer, member (until January 2025)
- prof.dr.ir. E. (Edwin) Zondervan, member

Official secretary of the committee is J. (Jessica) Greven, LLB. The committee and official secretary are for practical matters supported by H. (Hèla) van Rijssen-Klaczynski, LLB. The secretariat can (also) be reached via [cwi@utwente.nl](mailto:cwi@utwente.nl).

The confidential advisers for the complainants are Em.Prof.dr. J.C.T. (Jan) Eijkel. The confidential advisor for the defendants is Prof.dr.ir. A. (Alfred) Stein.

### 3. Way of working CWI

This paragraph describes the way of working and procedure of the CWI, in which points of attention and lessons learned in previous years have been included.

#### a. **Complaints received**

In the event of a suspected violation of scientific integrity, a complaint can be filed with the CWI. A complaint is usually filed with the CWI through the secretary, although a complaint can also be filed through the Executive Board, after which the complaint is forwarded to the secretary. Once a complaint is filed, contact occurs between the secretary and the submitter - or complainant - to assess whether the CWI complaint procedure is appropriate. The person mentioned in the complaint as the defendant is notified of receipt of the complaint, as are the Executive Board and the dean of the faculty where the person is employed.

Based on cases from 2023-2024 the suggestion will be made to inform the defendant not only about the sole fact that a complaint was filed, but that also the complaint itself will be shared with the defendant. See the CWI Annual Report 2023-2024 regarding this suggestion.

Both complainant and defendant are referred to, among other things, the availability of the relevant confidential advisor, the ombudsperson and the applicable rules and procedures in accordance with the complaints procedure. It is emphasized to both complainant and defendant, partly in response to Annual Report 2022, that submitting a complaint to the CWI leads to a formal complaints procedure, with an administrative final conclusion, in which the submitter acts as 'complainant'.

**b. Composition of the committee and its independency**

Each complaint received is, following the Annual Report 2022, reviewed anonymously, and discussed, as before, confidentially by the secretary with the chair or vice-chair (the latter, since May 2023, if the Chair is institutionally too close to the subject of or parties to the complaint - in accordance with the University Council's request) in order to assess what the composition of the handling committee may be. This handling committee shall be formed of at least three members, including the chair or vice chair of the CWI, in accordance with the complaints procedure. The committee shall be composed of CWI members who can fulfil their role in the handling of the complaint impartially and independently. In accordance with article 5 of the complaints procedure, members of the committee who are in any way involved with the persons or facts to which the complaint relates are not eligible to handle the complaint in question. This also applies to the chair, in which case the vice chair acts. In exceptional cases, this means that external members must be appointed. In Annual Report 2022 it was emphasized that the criterion that, by definition, a member may not be from the same faculty in which the complainant and/or defendant is or was employed, is not absolute. What is crucial is that the member be undeniably factually independent and impartial. Following the Annual Report 2022, the composition of the handling committee is reported to the complainant, defendant and the Executive Board with the notice that they may raise objections to it.

**c. Assessment and advice**

This handling committee will first assess whether the complaint is admissible. If the complaint is inadmissible, the committee cannot consider the substance of the complaint and will inform the Executive Board. If the complaint is admissible, the committee will assess the substance of the complaint.

As part of the substantive assessment, the parties can be heard at a hearing, unless obviously unnecessary for the committee. The committee considers what further information is necessary to make a proper assessment of the complaint. Finally, the committee prepares its advice, which is shared with the complainant and the defendant for verification of any factual inaccuracies. Convincing corrections may be incorporated into the final recommendation, after which the advice is shared with the Executive Board. The secretary elaborates on the advice with the rector, as the portfolio holder, and with the Executive Board. The Executive Board ultimately decides on the complaint with an intended decision, after which the parties may initiate proceedings with the National Organization for Scientific Integrity (LOWI). If the LOWI is requested to give advice, the Executive Board is to act as a 'party' and await the advice of the LOWI before making a final decision in the complaint at hand.

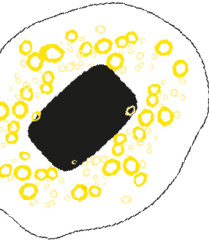
**d. Correspondence**

The secretary of the CWI handles correspondence with the Committee members, with all parties involved, also external, and with the Executive Board. The secretary also handles correspondence with the LOWI on behalf of the Executive Board. All correspondence is confidential and is treated and archived as such. In processes of administrative handling within the University, it is also handled as such.

**4. Complaints**

In the previous Annual report (January 2023 – Augustus 2024) the CWI announced to have advised the Executive Board in 3 cases: one in 2023, two in 2024. At that time it was not possible to report on the cases, as they were still being handled. These complaints were finalised in 2025, and can be summarised as follows:

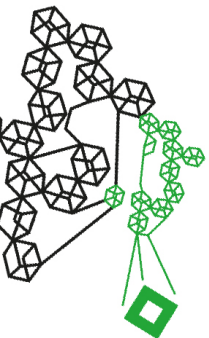
**2023-02:** inadmissible. The complaint concerned shortcomings in and in the run-up to a report. The CWI initially concluded a breach of confidentiality and therefore advised not to handle the complaint. The LOWI judged that not continuing the complaints procedure was disproportionate and advised that the complaint be dealt with on its merits. The CWI subsequently issued a substantive advice, namely: unfounded, because on the one hand there seemed to be a substantive difference of opinion and on the other hand the CWI concluded that no standards had been violated. The LOWI then once again reconsidered the complaint, this time focusing on the substantive assessment, and concluded



that the complaint should be declared inadmissible because, according to the LOWI, the publication in question is not a scientific product to which the code of conduct and complaints procedure apply, as the research was conducted under the name or responsibility of an external party (including its corporate identity and logo) and not the University of Twente. The Executive Board adopted this advice from the LOWI.

**2024-01:** inadmissible. The complaint concerned a publication that, according to the complainant, was flawed and did not comply with core values of scientific integrity. In order to guarantee impartiality, or at least to remove any appearance of partiality, it was decided in consultation with the Executive Board to compose a Committee of external members to handle this complaint. The CWI deemed the complaint inadmissible and advised to not consider the complaint on its merits. The Executive Board adopted this recommendation. The LOWI ruled that an initial substantive review of the complaint showed that the discussion the complainant wishes to have is a substantive one, but does not essentially concern scientific integrity. The LOWI concluded that the complaint did not need to be considered on its merits because it involved a breach of confidentiality due to the premature public disclosure of allegations of scientific integrity violations, which could cause significant damage to scientists and would prevent the complaint from being handled with due care. The LOWI advised the complaint to be declared inadmissible. The Executive Board has adopted this advice.

**2024-02:** unfounded. The complaint concerned a publication which, according to the complainant, contained inaccuracies and misrepresentations of such a nature that, in the complainant's opinion, it constituted scientific misconduct. In order to guarantee impartiality, or at least to remove any appearance of partiality, it was decided in consultation with the Executive Board to set up a CWI with external members to deal with this complaint. The CWI ruled the complaint inadmissible because, in its opinion, the complaint concerned a professional difference of opinion and it had not been demonstrated that scientific integrity was at stake. Resolving a difference of opinion that does not involve a violation of scientific integrity standards falls outside the scope of this complaints procedure. The Executive Board adopted this advice. The LOWI concluded that no standards of scientific integrity had been violated by those involved in this complaint, while emphasizing that, in the opinion of the LOWI, some serious allegations lacked factual basis. Because a (light) substantive review was necessary to determine that the elements of the complaint did not concern a possible violation of scientific integrity but rather a difference of opinion between researchers involved in the same topic, LOWI advised to declare the complaint unfounded in stead of inadmissible. Based on this advice, the Executive Board declared the complaint unfounded.



In addition, during the period covered by this report, the CWI issued advices in four complaints (one in 2024 and three in 2025). Although these complaints are in the final stages of processing, they were not fully resolved during the period covered by this report and therefore cannot be included in this annual report. They will be reported on in the next annual report. All complaints that have been handled substantively are to be published anonymously on [the UNL website](#). Summaries of the complaints can be found on the [UT page](#) of the CWI.

Complaints are usually related to topics such as intellectual property, authorship, funding, contracts, publishers, non-scientific interests, secondary positions and the reputation of science being at stake. Complaints often concern complex issues with a long history, sometimes accompanied by tensions regarding ethical views or in relation to a labour dispute, which may have damaged mutual trust between parties. Not all reports made to the confidential advisor lead to an actual complaint.

Based on case studies, whether or not they involve a formal complaint, the following additional observations can be made with regard to the previous paragraph:

- Other aspects often play a role, such as a labour dispute, conflicts related to hierarchy or responsibilities, or power dynamics. Complaints are often resolved internally or do not find their way to CWI (the reason for which is unclear). Handling a complaint internally does not have to

be a problem in itself, as the aim to find an intercollegiate solution or informal resolution of conflicts is stated in the Complaints Procedure, as long as it does not restrict the possibility of exercising the right to complain (see also 6c and 6e of this report).

- Often, multiple interests are at play, or there is an agenda other than assessing whether scientific integrity standards have been violated. As a result, a CWI or LOWI procedure is sometimes initiated for other reasons.
- Part of the complaints received by the confidential advisor for complainants correspond with the CWI complaints.
- The confidential advisors note that in some cases the right to complain is used to complain, not to solve the problem, in which case mediation is refused. In other cases, mediation is used or at least offered.
- Noteworthy is a situation in which a defendant's feeling of physical insecurity was expressed to the confidential advisor. Security was involved.
- The number of Members and confidential advisers needs to be increased. A concrete expansion is in sight (see also 6L of this report).

## 5. Lessons learned from the 2024-2025 annual meeting

This section contains an overview of points for attention, areas for improvement and lessons learned from case studies or processes arising from this annual meeting.

- In relation to what is mentioned in chapter 4; although the right to complain should not be restricted, the process of going to the CWI and the LOWI could be better described in order to manage the expectations of those involved. To this end, information will be refined. This includes the presentation of information on the website and amending the legal remedies clause in decisions by clarifying that, although the possibility remains, the LOWI only assesses procedures marginally and is not to be used as a 'higher appeal' (see also 6h of this report).
- The cases show that it is not always clear what the responsibilities of students/PhDs and their supervisors/seniors are. Guidelines are in place, but refining or clarifying them could help to clarify this point. Internal coordination will be sought to achieve this (see also 6j of this report).
- The confidential advisers continue to ask for attention to the accessibility of the complaints procedure, based on the average number of three CWI complaints per year and the number of 'complaints' that are intercepted in advance by the confidential adviser for complainants.
- The fact that the confidential adviser for complainants also acts as a mediator can be seen as conflicting with the role of confidential adviser (as stated in NRIN context). Although it may sometimes seem appropriate in a specific case for the confidential adviser to act as a mediator, it may contribute to role clarity if the complaints procedure is amended accordingly. It will therefore be proposed to the Executive Board that the complaints procedure be amended to stipulate that the confidential advisers for Scientific Integrity do not act as mediators. The Ombudsperson may act as mediator.
- The lack of representation of UT (and even 4TU) in LOWI is a cause for concern. A nomination on behalf of the UT will be made via UNL.
- The complaints procedure will be amended on a number of aspects arising from case studies (see also page 6 of this report), namely:
  - Clarification regarding the request by a party for anonymous treatment (Art. 2.5),
  - Sharing the complaint with the defendant at the start of the complaints procedure (Art. 5.3) (see also 6f of this report).

## 6. Continuation of previous lessons learned, ongoing or with a sequel

This section contains ongoing or updated focus areas arising from the [annual reports for previous years](#) published on the website, to the extent that the areas have not already been incorporated in Section 3 'Way of Working CWI'.



## **a. Follow up recommendations UC-Oz 2023**

During the previous review of the complaints procedure (2023), the UC-Oz provided advice on the complaints procedure. Those advices were not realizable during that review, so they will be considered for upcoming review of the complaints procedure [2026]. The advice reads:

- i. *“Investigate whether it is necessary, appropriate and desirable to expand the scope of the UT complaints procedure to include support staff.*
- ii. *Investigate whether it is necessary, appropriate and desirable to make the submission of a certificate of good conduct [VOG verklaring] mandatory for the appointment of committee members or confidential advisers.”*



## **b. Trust and learning process**

UT relies on the scientific integrity of its employees. In the CWI procedure, this is expressed in 'the presumption of innocence/scientifically ethical behaviour, unless proven otherwise', in accordance with the Dutch code of conduct and the complaints procedure. In doing so, 'learning lessons' will be the primary goal for all involved: a filed complaint does not necessarily mean a violation, violations occur in different degrees and not every violation justifies the imposition of sanctions. It remains a learning process, as the confidential advisors and the University Council also emphasized. The CWI has incorporated these principles into the complaints procedure and its way of working. [Annual Report 2022]

## **c. Intercollegiate resolution**

UT encourages, before a CWI complaint procedure commences, the handling of issues in an intercollegiate setting. This was also the advice of the LOWI and the confidential advisors. Of course, everyone retains the right to actually file a complaint. [Annual Report 2022]

## **d. Formality CWI procedure**

The CWI procedure is a formal complaints procedure, in which the task of the CWI consists of handling complaints received and giving advice on them to the Executive Board, as required by the Dutch code of conduct and the complaints regulations. This role is not compatible with the wish to have the CWI fulfil other roles (such as giving advice on a generic subject), particularly in view of the requirement of impartiality and independence. Thus, the CWI will refrain from fulfilling other (advisory) roles. [Annual Report 2022]



## **e. Informal handling**

Many reports made to the confidential advisor for complainants can be resolved without the need to initiate a formal complaints procedure. This was already concluded in the 2021 annual report. This is in line with the UT's vision (as stated in the 2022 annual report and emphasised in the complaints procedure as of 2023), namely the informal handling of issues that are not subject to assessment by the CWI, for which another route is appropriate (such as the intervention of the ombudsperson) or if handling in a more informal setting is more desirable or appropriate (as also recommended by the LOWI). In any case, this will be investigated in the initial phase (prior to, at the time of, or immediately after submitting a complaint to the CWI). The issues discussed with the confidential advisor for complainants are also regularly resolved between the parties in an appropriate manner at that stage. This may even prevent a feared future violation, although it is not always possible to say whether a violation would have occurred without mediation.

It is important to ensure that such informal discussions are always explicitly placed in the context that everyone has the right to file a complaint with the CWI. The CWI must remain accessible to everyone so that, in the interests of those involved, of the university and of research, advice can be provided on issues of scientific integrity if desired. It is important to maintain a balance between formal and informal handling and to prevent that informal handling insufficiently contributes to institutional learning from case studies. The confidential advisor for complainants provides input (number and categories) on this casework for the annual meeting, with respect for confidentiality, so that also the Executive Board can determine which aspects or practices within the UT require (additional) attention. [annual report 2022]

## **f. Sharing the complaint received with the defendant**

Case studies in 2023-2024 showed that consideration should be given to amending the complaints procedure with regard to informing the defendant(s) immediately after receipt of a complaint. Under the current complaints procedure, after receipt, the accused is only informed that a complaint has been received, and the content of the complaint and the identity of the complainant are only shared with the accused after a positive admissibility assessment. This is not only unpleasant for the accused, who remain in an uncertain and waiting position, but also undesirable because it deprives the accused of the opportunity to identify any statements made by the complainant(s) in the (social) media (and to report them if necessary). The CWI and the Executive Board intend to implement this change in the next revision of the complaints procedure, expected in the calendar year 2026. [Annual Report 2023-2024]

## **g. Personal approach**

Despite the formal nature of the process as a complaint procedure, a “personal approach” should be pursued. The CWI has incorporated this into its way of working. [Annual Report 2021, 2022]

## **h. LOWI**

The LOWI is an independent advisory body, not an appeal body. If the Executive Board has received advice from two expert committees (i.e. CWI and LOWI), then the content of the considerations of both advices is important for the final decision of the Executive Board. It is certainly not the case that the advice that is most favourable to the defendant is always followed; after all, a CWI advice that is favourable to the defendant would make it unnecessary for the complainant to go to the LOWI. Advice is always weighed in terms of content. [Annual Report 2022]

## **i. Breach of confidentiality**

With regard to the possibility of dealing with a complaint that has previously been raised in the publicity, it can be concluded that the rule of confidentiality from the complaints regulations only applies once a CWI procedure has been initiated - including the complaint itself. If a party speaks out in the media about the complaint or during the procedure of handling the complaint, this may burden the handling to such an extent that the CWI must decide that the handling cannot continue. Because the other party may still have an interest in continuing, such a far-reaching decision should not be taken too quickly. The CWI considers this in its deliberations. [Annual Report 2022]

## **j. PhD students(‘ policy)**

Signals regarding the more vulnerable position of doctoral students make the CWI extra sensitive in case of any future complaints. The importance of the Graduate School is mentioned. Also in Annual Report 23-24 it is stressed that, given the hierarchical/subordinate position of the PhD student, it is important that the PhD student is adequately supported. There is a mandatory course in Scientific Integrity for external PhD students. It is being investigated whether the mandatory course on Scientific Integrity for external doctoral students also adequately mentions the CWI and the related procedure. [Annual Report 2022 and 23-24]

## **k. Investing in (after)care**

In all complaint processes, parties involved can be emotionally affected. As a point for improvement, the steps for aftercare in the process of handling a CWI complaint have been explicitly discussed in the Executive Board. Part of this is that the rector engages with the parties after the CvB has made a decision. This form of aftercare is viewed positively by those involved and will be continued. Aftercare in the broadest sense of the word (by the Executive Board, confidential advisors or HR) remains an ongoing focus area, at least in the context of scientific integrity, and is the subject of discussion in, for example, UT-wide meetings such as the 'UT help structure'. [Annual Report 2021]

## **l. Appointment additional confidential advisors**

Confidential advisors are extremely important and valued in the CWI process. The Executive Board and CWI are making efforts to appoint additional (internal and possibly external) confidential advisors. [Annual Report 2021]



**m. Transparency and website**

To promote transparency to the UT community, also on advice of the University Council, [the CWI website](#) is updated continuously to include case histories and lessons learned from the annual report. [Annual Report 2022]

**n. Attention to turnaround times**

On an ongoing basis, the feasibility of the turnaround times as stated in the complaints regulations is examined, as well as on whether it is sufficiently clear what possible reasons there may be for delay (such as: a hearing, an additional investigation or a LOWI procedure). [Annual Report 2021]



**o. Media policy**

Complaints are posted anonymously on the UNL website and the UT website. Communication to outside UT about complaints is through the CvB spokesperson. Messages, in any sense or manner, must be weighed on an individual basis, taking into account the nature and sensitivity of the matter. Part of this is coordination between CWI (chair and/or secretary) and spokesperson of the Executive Board. Care is to be taken when sharing information about the content of the complaint. In national context (CWI meetings, rectors' meetings), case histories are discussed anonymously and confidentially for awareness and learning. The CWI website has been updated accordingly. [Annual Report 2021]

**p. Complaints procedure**

The scientific integrity complaints procedure will be amended when necessary on topics identified in annual reports.