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# Research Integrity, A Collective Enterprise

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## Introduction

Since 2014, I have more or less left the field of migration and asylum law for a new challenge: research integrity. In 2013 I was appointed Confidential Advisor for Research Integrity at Radboud University and in 2014 I became the Chairman of the National Board for Research Integrity, in Dutch: Landelijk Orgaan Wetenschappelijke Integriteit (LOWI). In second instance, the LOWI decides after the Board of an institution affiliated with the LOWI about an alleged violation of research integrity. The work is very similar to my former position as National Ombudsman. There it was all about administrative integrity, nowadays research integrity is the focus point. But the manner of investigation, reporting on the findings and the method of concluding and advising are very similar.

In this respect I am unfaithful to Elspeth. In 1997 we, Elspeth, Kees Groenendijk and I, started our joint adventure that ended in 2000 in a beautiful dissertation and that co-operation lasted – with interruptions on my part – until today. An almost infinite list of scientific publications is now on Elspeth's name. As a researcher and writer you are always aware of the question of research integrity – one time more than the other – but it is always there in the background. In this contribution to the *Liber Amicorum* for Elspeth, I want to delve deeper into the issue of research integrity: what are the standards and how are they enforced. I would like to draw on the many cases that played at the LOWI.<sup>1</sup>

## Research Integrity, Codes of Conduct

The standards for research integrity are laid down in Codes of Conduct. There are many.<sup>2</sup> The European Code of Conduct for Research Integrity 2017, the so-called ALLEA Code<sup>3</sup> and the Netherlands Code of Conduct for Research Integrity<sup>4</sup> which came into force on 1 October 2018 are particularly important for LOWI. The last code replaces the Netherlands Code of Conduct for Academic Practice 2004, revised in 2012 and 2014.

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1 This contribution is based on my lectures on research integrity for Geosciences PhD students at Utrecht University (2015 and 2016) and my presentation for the PRINTEGER conference (23-8-2018).

2 See [www.lowi.nl](http://www.lowi.nl) Assessment framework of LOWI.

3 Published by ALLEA – All European Academies.

4 Published by KNAW, NWO, Vereniging Hogescholen, NFU, To2 federatie en VSNU.

Remarkably, the issue of scientific integrity started already in 2001 with a memorandum of the Royal Netherlands Academy of Arts and Science<sup>5</sup> after a much-discussed affair (the plagiarism of prof. R. Diekstra, 1996-1998<sup>6</sup>). In May 2003 the National Board for Research Integrity (LOWI) was established and a code of conduct for scientific researchers was drawn up by the Association of Universities in the Netherlands, which came into force on January 1, 2005: the Netherlands Code of Conduct for Academic Practice. Nevertheless, the numbers at LOWI were still very limited. The attention for issues of research integrity is a rather recent one. It started with a serious incident, the Stapel case.<sup>7</sup> Diederik Stapel is a former Tilburg professor of social psychology. He was seen as a prominent Dutch psychologist, who also regularly participated in the public debate. In September 2011 his fraud came to light through complaints from his PhD students. These complaints have been investigated by a Commission. In 55 publications fraud with a very high degree of certainty was established. Strong indications of fraud were fixed by a dozen articles. There are also other publications, parts of books and dissertations, which are (almost certainly or very likely) based wholly or partly on fraudulent research. From that day on, September 2011, research integrity is a highly sensitive issue and all universities in the Netherlands declared research integrity as a top priority. Institutional codes were drafted, confidential advisors appointed and Research Integrity Committees established. And since the number at LOWI are rising.

We have seen the same with human rights codes of conduct in the past. The parallels are striking. Like human rights standards, research integrity standards are considered as granted until an incident proves the opposite. From that moment on, the codes become instrumental, living instruments and grows the public attention for issues as research integrity.

Research integrity codes are only a capstone. They are instruments of the last resort. They in itself do not bring forward adherence to research integrity standards. Therefore more is needed. Education in research integrity standards during PhD courses and during bachelor and master programmes are needed.

## Research Integrity Procedures

Nevertheless, in the end the Codes of Conduct and the University Regulations for research integrity are important. The structure of the Regulations is rather simple. Everyone is entitled to file a complaint to the Executive Board of the University, with or without the Confidential Advisor. The Board send the complaint for advice to the Research Integrity Committee. The Committee considers the complaint on its admissibility and on its merits. It hears all the relevant parties and draft a report of findings and recommendation for the Board, but in the end it is the Board who decides the complaint.

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5 Notitie Wetenschappelijke Integriteit, only available in Dutch.

6 J. Dijkhuis, W. Heuves, M. Hofstede, M. Janssen, A. Rörsch, *Leiden in Last. De zaak Diekstra nader bekeken*. Leiden: Elmar 1997.

7 D. Stapel, *Ontsporing*. Amsterdam: Prometheus 2012. Translation *Derailment*, available on the NRIN website ([www.nrin.nl](http://www.nrin.nl)).

It is quite a step, in particular for young employees to address the Board with a complaint. For that reason the Confidential Advisor acts as a contact point for questions and complaints about research integrity. The Confidential Advisor does not take any decision on the admissibility or on the merits of the complaint. But in the event of a reasonable complaint he may mediate between the complainant and the defendant. If the mediation is not successful or otherwise he may explain the complainant how to file a complaint or offer his service to channel the complaint to the Board. If the complainant withdraws his complaint he leaves the Confidential Advisor with empty hands, even when the advisor is of the opinion that the complaint is serious. The advisor cannot take any step without the consent of the complainant. It is a fully confidential procedure.

If the Executive Board of the University declares the complaint inadmissible or rejects the complaint on its merits, the complainant, and in the case that the Board considers the complaint well founded, the defendant may address the National Board for Research Integrity (LOWI) for advice on the opinion of the Board, a kind of an appeal or second opinion procedure. But again, the decision of the LOWI is only an advice. In the end, it is the Board who decides the appeal.

## Research Integrity Standards

Research integrity is still a notion in progress. It should be developed further in the case law, in particular in the opinions of the LOWI, the National Board for Research Integrity. Nevertheless, there is broad consensus that next to fabrication (entering fictitious data), falsification (falsifying data) and plagiarism (FFP), violations of research integrity will in any case be understood to mean: deliberately ignoring contributions of other authors, falsely posing as (co-) author, intentionally making incorrect use of (statistic) methods and/or intentionally interpreting results incorrectly, committing attributable inaccuracies when carrying out research and allowing and concealing misconduct of colleagues.

The developing character of the notion of research integrity is clearly illustrated by a national debate in the Netherlands on self-plagiarism or text recycling that took place some years ago. Is the extensive use by an author of the results of his earlier research findings a violation of research integrity? It is a sensitive issue, in particular when it happens without correct citations. The Royal Academy reacted with an extensive opinion in which it underlines the importance of correct citations.<sup>8</sup> Of course, a researcher may use his earlier findings, but he should mention the correct sources of these earlier

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8 KNAW, *Correct Citation Practice*, Academy Advisory Memorandum, Amsterdam; KNAW 2014.

findings.<sup>9</sup> In accordance with this opinion the Code of Conduct was amended in October 2014 and the new 2018 Code of Conduct has explicitly formulated a standard in this regard.<sup>10</sup>

The numbers of LOWI-cases are still limited. In the early years there were none, or only one or two per year. Since 2011 (Stapel) the numbers are rising. Last year (2018) there were 29 complaints for the LOWI. Besides some very serious complaints there is an increase of manifestly unfounded complaints.

From my experience as Confidential Advisor, internal complaints from inside the university are rare. Most complaints were external, from scientists of other institutes or universities or from science journalists. From the structure of the regulations the Confidential Advisor is typically designed for internal complaints, to lower the step to launch a complaint.

## Orientation of the Codes of Conduct

The original Codes of Conduct addressed only the individual researchers, not the institutions as such. Research integrity was mainly seen as an individual responsibility, not as a collective responsibility of researchers and their institutions. This was true for the first 2011 ALLEA Code and for the Netherlands Code of Conduct for Academic Practice 2004.

But it changed with the 2017 ALLEA Code and the Netherlands Code of Conduct for Research Integrity 2018. The new ALLEA Code gives attention to the research environment, what research institutions and organisations should do to promote awareness and ensure a prevailing culture of research integrity, providing clear policies and procedures on good research practices and a proper infrastructure for the management of data and research materials. Training, supervision and mentoring are important tasks for all research institutions and organisations.<sup>11</sup>

The new Netherlands Code of Conduct for Research Integrity 2018 formulates in its chapter 4 the institutions' duties of care for training and supervision, research culture, data management, publication and dissemination and ethical norms and procedures. Remarkably, the complaint procedures for research misconduct on the part of the researcher do not apply to the institution's duties of care. In this respect research integrity is still not a collective enterprise of researchers and their institutions.

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9 Self-plagiarism played a role in LOWI-opinions 2015-02 and 2016-01 (see [www.lowi.nl](http://www.lowi.nl)). An internal investigation committee of the Free University Amsterdam (VU) has accused a VU professor emeritus of (self-)plagiarism. LOWI concluded that the accused and his PhD student could not be blamed for plagiarism, but only careless source references. LOWI criticized the VU about the way in which it had dealt with the accusations and about how it had acted in the publicity.

10 Standard 41: Avoid unnecessary reuse of previously published texts of which you were the author or co-author. a. Be transparent about reuse by citing the original publication. b. Such self-citation is not necessary for reuse on a small scale or of introductory passages and descriptions of the method applied.

11 ALLEA-code 2017, par. 2.1 and 2.2.

## The Bonn PRINTEGER Statement

Research integrity is inherently linked to the quality and excellence of research and science for policy. To further this agenda, the European PRINTEGER project (Promoting Integrity as an Integral Dimension of Excellence in Research) has conducted comprehensive studies on research integrity and misconduct.<sup>12</sup> The research of the PRINTEGER consortium shows that there is a need for increased focus and guidance on how organisations and institutions may address such issues.<sup>13</sup>

### *A Changed Perspective*

To complement the existing instruments such as the ALLEA Code and the new Netherlands Code of Conduct, the PRINTEGER Statement focuses on institutional responsibilities for strengthening integrity. It takes into account the daily challenges and organisational contexts of most researchers. The statement intends to make research integrity challenges recognisable from the work-floor perspective, providing concrete advice on organisational measures to strengthen integrity. The consortium emphasises 13 key issues, elaborated in subsequent paragraphs.<sup>14</sup>

#### *Dealing with Misconduct*

In the short room available for me in this *Liber Amicorum* I will not deal with all the subjects of the PRINTEGER Statement but concentrate on some procedural aspects of this statement by looking at a number of recent LOWI opinions. I will focus on the following topics:

- Increasing transparency of misconduct cases (par. 9),
- Protecting the alleged perpetrators (par. 11)
- Establishing a research integrity committee and appointing an ombudsperson (par. 12), and
- Making explicit the applicable standards for research integrity (par. 13).

### *Increasing Transparency*

The PRINTEGER Statement is very explicit in this respect. 'In order to stimulate organisations' capacity to learn from experience, there must be transparency. This means that organisations should be open about cases of confirmed research misconduct after they have been investigated, while safeguarding the legitimate rights to privacy and

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12 [www.printeger.eu](http://www.printeger.eu).

13 E.-M. Forsberg, F.O. Anthon, S. Bailey, G. Birchley, H. Bout, C. Casonato & M. Zöller, 'Working with Research Integrity – Guidance for Research Performing Organisations: The Bonn PRINTEGER Statement', 24 *Science and Engineering Ethics* 2018, p. 1023-1034, doi:10.1007/s11948-018-0034-4.

14 Paragraphs 1. Providing information about research integrity; 2. Providing education, training and mentoring; 3. Strengthening a research integrity culture; 4. Facilitating open dialogue; 5. Wise incentive management; 6. Implementing quality assurance procedures; 7. Improving the work environment and work satisfaction; 8. Increasing transparency of misconduct cases; 9. Opening up research; 10. Implementing safe and effective whistle-blowing channels; 11. Protecting the alleged perpetrators; 12. Establishing a research integrity committee and appointing an ombudsperson; 13. Making explicit the applicable standards for research integrity.

personal data protection of individuals, as regulated in national and European laws. (...) Mandating organisations to report misconduct, and to cooperate with other organisations to collate this misconduct data, is likely to be effective in the long term.<sup>7</sup>

The need for transparency and confidentiality in dealing with misconduct are underlined in the new ALLEA Code as well, although less elaborated than in the PRINTEGER Statement. The same is true for the new Netherlands Code of Conduct for Research Integrity: ‘At least in all cases where research misconduct is established, the executive board of the institution ensures that the findings of the investigation and its final judgement are made public in anonymized form’.<sup>15</sup>

The practice is sometimes more stubborn than these clear rules from PRINTEGER, ALLEA and the Netherlands Code of Conduct seem to suggest. Illustrative is LOWI-opinion 2016-1. In this case the Board of the Free University Amsterdam carried out an *ex officio* investigation, and the Board immediately (i.e. without waiting for a possible opinion from the LOWI) proceeded to make a non-anonymous publication of its decision.

LOWI ruled as follows. An *ex officio* investigation is also an integrity investigation, with the researcher finding himself in a vulnerable position. There is no reason to impose different criteria in the case of an *ex officio* investigation than in case of an investigation based on a complaint. There was sufficient reason to apply the guarantees in the Complaints Regulations of the Free University by analogy. In this respect it is profit that the new Code of Conduct explicitly indicates that the procedures for complaint handling have to be followed even if the institution considers it necessary to conduct an investigation on its own initiative into non-compliance with the standards for good research practices.<sup>16</sup>

The basic rule of the Complaints Procedure is that an anonymised summary of the findings and the opinion by the Research Integrity Committee are published. The Board deviated from this by publishing without anonymization. Nevertheless, the LOWI ruled quite lenient. Because the case had already, long before, been brought to the attention of the press with the full name being given, the Board could reasonably decide to publish without anonymization. Anonymized publication did not in fact serve a reasonable purpose any longer.

### ***Duty of Confidentiality***

The Board and other parties involved should take into account the purpose of the duty of confidentiality. In addition to a procedural guarantee for those involved, the duty of confidentiality is also required for the effective performance of duties by the LOWI to take place. The LOWI is entrusted to review a contested (preliminary) decision of the Board and advise on this. If there is a reason for it, LOWI will advise the Board to revise the decision. Thereafter, the Board takes its final decision.

Under the old LOWI Regulation, the duty of confidentiality started from the date on which the complainant submitted the complaint to the LOWI with the result that there was no formal duty of confidentiality during the period the Board published its

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15 Netherlands Code of Conduct for Research Integrity 2018, par. 5.4, principle 18.

16 Netherlands Code of Conduct for Research Integrity 2018, par. 5.4, intro.

contested (preliminary) decision and the start of the LOWI procedure.<sup>17</sup> In the new LOWI Regulation 2018 the duty to maintain confidentiality is extended from the announcement of the (preliminary) decision of the Board to the announcement of the final decision.<sup>18</sup>

The duty of confidentiality, throughout the procedure, is of great importance. When allegations of violation of the principles of research integrity are prematurely made public, when no final ruling has been passed, it can be harmful to researchers and hamper further careful handling of the complaint (to the Board) or the petition (to the LOWI). Therefore, it is in the interest of all parties involved to observe the duty of confidentiality and not make any suspicions, allegations or accusations public. Even after the final decision of the Board, all Parties must continue to exercise restraint in order not to harm the original defendant and their reputation in the field. This is especially true when the complaint about violation of the principles of research integrity is unfounded. Breach of confidentiality by the representative of the Petitioner was the subject of LOWI opinion 2016-14. On 26 January 2016, the representative submitted the petition to the LOWI. In any case, from that moment, in the same way as the Petitioner, the representative, under Article 10 of the LOWI Regulation (old), was obliged to maintain confidentiality. But a few days later he addressed the matter explicitly in an interview with a newspaper and indicated that the opinion of the Research Integrity Committee of Leiden University was the main reason for submitting a petition to the LOWI. The LOWI ruled that with this interview, as published in the newspaper (and on the website of the representative), he had violated the obligation to maintain confidentiality.

In Opinion 2017-05 the Board of Leiden University decided to discontinue the complaints proceedings because the complainant had ignored an injunction to remove all online communication about the complaint within a specified period. LOWI agreed. The Board could discontinue the complaint proceeding due to (persistent) violation of the duty of confidentiality by the Complainant.

To this extent, the transparency principle of the PRINTEGER statement, ALLEA and the Netherlands Code of Conduct requires nuance. Publication of the decision of the Board must wait until the appeal period at the LOWI has expired or until a definitive decision has been made on the basis of the opinion of the LOWI. It is recommended that next to the LOWI Regulation 2018 this nuance is explicitly included in the VSNU Model Complaints Procedure Research Integrity and the resulting complaint procedure regulations of the institutions.

### ***Protecting the Alleged Perpetrators***

According to the PRINTEGER Statement researchers accused of misconduct are innocent until proven guilty. Their privacy must be protected throughout the whole investigation process in accordance with applicable legislation. In cases where accused researchers are cleared of accusations, appropriate measures must be taken to ensure that their names and reputations are not damaged or are repaired. As even unfounded

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17 LOWI Regulation (old), Article 10.

18 LOWI Regulation 2018, Article 4.

complaints may cause damage to a researcher, it should be made clear that malicious complaints are a breach of research integrity.

The ALLEA Code recognizes the same principles: presumption of innocence, confidentiality of the procedures, appropriate restorative action and accusing a researcher of misconduct in a malicious way is a violation of research integrity itself. The same is true for the new Netherlands code of conduct in its paragraph 5.4 on complaint procedures.

### *Anonymous Complaints*

What is missing in the PRINTEGER Statement and the ALLEA Code is the issue what to do with anonymous complaints. In line with the LOWI case law the new Netherlands code of conduct is clear on this issue: anonymous complaints will not be considered. However, the institution can in that case initiate an investigation on its own initiative.<sup>19</sup>

Leading in this respect is LOWI-opinion 2015-02. It concerned a possible violation of the principles of research integrity in which an anonymous complainant complained to the Board of Free University Amsterdam about assumed plagiarism. In essence, the LOWI deemed it undesirable for a complainant to maintain complete anonymity – meaning that no one knows the identity of the individual involved – in cases concerning possible violations of the principles of research integrity. This is in line with the Memorandum on Scientific Integrity 2001 of the Royal Netherlands Academy of Arts and Sciences, which states that ‘anonymous complaints are not (and cannot be) considered’. By the way, the 2001 Memorandum is the founding document of LOWI as well.

In so far as an institution’s complaint procedure allows for anonymous complaints, the LOWI considers that the Board of such an institution must proceed with great caution when exercising the competence to review (completely) anonymous complaints. The requirements of transparency, the right of defence, and the right of both parties to be heard are naturally prohibitive factors for such complaints. The interests of a complainant who wishes to remain anonymous can best be served by a satisfactory whistle-blower’s system and by the undertaking to maintain confidentiality, whereby the accused and/or the Research Integrity Committee do not know the name of the complainant (in this specific case), but the Board does. In such an approach, the anonymous complainant can be held responsible for adhering to the duty of confidentiality to the same degree as the other parties involved. The Board can also hear the anonymous complainant (in this case) separately, after which the accused has the opportunity to respond (in writing) to the minutes of the hearing. That would uphold the right of both parties to be heard and the right to defence, comply with the requirement of transparency, and serve the interests of both the anonymous complainant and the accused.

In the case of LOWI opinion 2015-02, the accused (a Moroccan female PhD student) filed a report with the police for defamation. Initially, the public prosecutor refused prosecution against the anonymous complainant NN, but was forced to do so

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19 Netherlands Code of Conduct for Research Integrity 2018, par. 5.4, principle 6.

by the Court of Appeal.<sup>20</sup> After a two-and-a-half year investigation, the public prosecution has failed to trace the identity of the anonymous complainant and has closed the case.

The accused filed a complaint with the Netherlands Institute for Human Rights as well. The Institute was of the opinion that the accused did not show that the Free University discriminated against her by considering anonymous complaints about her PhD research. But the Free University should have done more to protect the accused against media publications with a discriminatory nature.<sup>21</sup>

More successful was the accused in her civil procedure, a claim towards the Free University in connection with the way in which the university has dealt with the anonymous complaints. The Sub-district Court ruled that the university has acted in violation of the principle of good employment practices and has acted unlawfully towards the accused and condemned the Free University to pay compensation of euro 7.500.<sup>22</sup>

### ***Establishing a Research Integrity Committee and Appointing an Ombudsperson***

According to the Bonn Statement there should be an integrity committee installed at the level of the institution or at the national level.

All research organisations should also have a research integrity ombudsperson. This function should be adequately resourced, well known in the organisation, and there should be a low threshold for contacting this person. Researchers who experience research integrity dilemmas or have come into an integrity related conflict should be able to discuss their case with the ombudsperson in a strictly confidential manner.

The function of the ombudsperson should be clearly separated from a formal research integrity committee, so it is clear to researchers that contacting the ombudsperson does not imply a formal registration of a case with the committee.

The ombudsperson function could include the responsibility to continuously assess the research integrity status of the organisation, and advise on policies and action plans for strengthening the work on integrity.

The ALLEA code is not very precise on the procedures for dealing with violations and allegations of misconduct. The code is limited to the principles that need to be incorporated into any investigation process. The New Netherlands Code of Conduct is also very limited on this point. The complaint procedure is subject of the National Model Complaints Procedure for Research Integrity. This Model Regulation has been drawn up by the joint Dutch universities as a starting point and an example for the complaints procedure of each university itself. The Model Regulation provides for a research integrity committee and a confidential advisor (a sort of ombudsperson) who may not be a member of research integrity committee.

In the Netherlands it is unfortunate that the formal and material provisions on research integrity are divided over two documents, the Code of Conduct for Research Integrity and the Model Regulation.

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20 Court of Appeal Arnhem-Leeuwarden 06-12-2015, case no. K14/1104.

21 The Netherlands Institute for Human Rights 24-07-2015, opinion 2015-87.

22 Sub-district Court Amsterdam 25-04-2016, ECLI:NL:RBAMS:2016:2702.

The Code of Conduct is binding to the institutions that subscribe to it. This code is already subscribed by the Royal Netherlands Academy of Arts and Sciences (KNAW), the Netherlands Federation of University Medical Centres (NFU), the Netherlands Organisation for Scientific Research (NWO), the Federation of Applied Research Institutes, the Netherlands Association of Universities of Applied Sciences and the Association of Universities in the Netherlands (VSNU). Other institutions, including private enterprises, can also subscribe to this Code.

The Model Regulation is produced by the Association of Universities in the Netherlands (VSNU) and addressed to the universities as a model for their complaint regulation but is not binding as such. For example, in the past the Free University had a complaint regulation in which the Ombudsman was a member of the Research Integrity Committee as well. In opinion 2015-02 the LOWI determined in line with the Bonn Statement that an Ombudsman or Confidential Advisor has a different role than a Research Integrity Committee and that an Ombudsman cannot therefore be a member of the committee that investigates the complaint. The Free University has amended its complaint regulation.

On the other hand, a non-university such as the Netherlands Organisation for Scientific Research (NWO) did not consider itself bound to the Model Regulation at all. In LOWI opinion 2017-12 the Applicant's complaint has been dealt with in substance by the Confidential Advisor and not by a Research Integrity Committee. The NWO Regulations do not require the involvement of a Research Integrity Committee. The LOWI has therefore found with some surprise that complaints are handled by NWO on the basis of a regulation that deviates from the prescribed Model Complaints Procedure of the VSNU on this point, and also on other points.

### ***Making Explicit the Applicable Standards for Research Integrity***

The Bonn Statement realizes that researchers are often members of disciplinary professional organisations that have research integrity guidelines that may not be completely aligned with the organisational ones. They may also engage in multi-disciplinary, multi-organisational and multinational projects and networks where there are different standards for research integrity, for instance related to authorship.

Organisations should be aware of potentially conflicting standards and must have a policy for addressing them. Project leaders should seek to specify the standards the project will follow from the very beginning; most preferably by making this explicit in a collaboration agreement. The chosen standard must be well-justified and refer to generally accepted guidelines for research integrity. This collaboration agreement should also make explicit how allegations of research misconduct will be addressed in a multi-organisational project.

The ALLEA Code is very explicit on collaborative working as well:

- All partners in research collaborations take responsibility for the integrity of the research.
- ...
- All partners formally agree at the start of their collaboration on expectations and standards concerning research integrity, on the laws and regulations that will apply, on protection of the intellectual property of collaborators, and on procedures for handling conflicts and possible cases of misconduct.

The new Code of Conduct for researchers and institutions in the Netherlands also formulates as standard for good research practice in joint research: make clear agreements about matters concerning research integrity and related matters such as intellectual property rights.

I am not aware of LOWI-opinions on collaborative working. As such collaborative working is not an issue of research integrity itself, but the need of mutual agreement on the applicable standards in collaborative working is obvious. Moreover, LOWI is not competent to advise on disputes in the field of labour law, intellectual property rights, copyright or patent law.

## **To Conclude**

The Bonn PRINTEGER Statement has emerged from the need for increased focus and guidance on how organisations may address research integrity issues. It serves that purpose excellently. The provisions are more precise, more elaborated than in documents such as the ALLEA code and the new Netherlands Code of Conduct on Research Integrity. It differs from the other documents by its strong focus on research performing organisations. In that respect the statement is of great help. Together, the more individually oriented codes and the organisationally and institutionally oriented PRINTEGER statement ensure that research integrity is a collective enterprise of researchers and their institutions.