

Annual Report 2024 – LOWI Advisory Committee



LOWI Report on the Year 2024

Amsterdam, June 2025

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The crow in borrowed feathers (colour etching), J.W.M. van der Meer, 2014

Foreword

In my foreword to the 2023 Annual Report I discussed the report that the LOWI's governing body, Stichting LOWI, commissioned from the Pro Facto research agency. This report (*Het LOWI ervaren / Experiencing the LOWI*) examined both how petitioners experience our procedure and the extent to which this reflects the principle of procedural justice.

Pro Facto's report provides less insight, however, into how those who are the subject of a complaint regarding a breach of research integrity experience the procedure. These researchers' experience of LOWI and Research Integrity Committee (RIC) procedures was discussed in an Argos radio programme on 29 March 2025 (currently available on www.vpro.nl/argos). This programme highlighted how researchers found defending themselves in complaints proceedings to be difficult if they publish on subjects that are part of and sometimes of pressing concern in a societal debate. This certainly applies in situations where petitioners are seeking to force a researcher to adopt a different view or to get their own point of view reaffirmed. The LOWI operates on the principle that professional (or other) differences of opinion between a petitioner and a researcher, whether as part of a scientific debate or otherwise, do not constitute grounds for a complaint regarding a breach of research integrity. The LOWI complaints procedure is not intended to resolve such differences of opinion. An example of this can be seen in [Advisory Opinion 2024-11](#), involving a complaint about research into the SARS-CoV-2 virus. In contrast to the RIC in this case, the LOWI found that various aspects of the complaint should be regarded as a professional difference of opinion and, therefore, as part of an academic debate rather than the subject of a complaints procedure.

One of the aspects underpinning this approach is the great importance that integrity procedures attach to academic freedom and researchers' right to freedom of expression. These freedoms are obviously restricted by the research integrity standards set in the 2018 Netherlands Code of Conduct for Research Integrity. This Code of Conduct is currently being revised in response to the 2024 report issued by the committee set up to establish the extent to which the Code continues to comply with the requirements of academia and society. A committee is now working on an amended Code of Conduct, on which the LOWI Advisory Committee will later publish its views.

Recent developments have highlighted the need for this new Code of Conduct to address the importance of researchers' freedom of research and freedom of expression more explicitly. It is concerning to see how, within the space of just a few months, universities and researchers in the United States have come under increasing pressure not to conduct research or publish on subjects and views not according with those of the Trump administration. The Royal Netherlands Academy of Arts and Sciences (KNAW) recently urged attention for these issues in its report on [Academic Freedom in the Netherlands: Response to Current Threats](#). The LOWI and RICs also have a responsibility in this respect. Maybe more so than in the past, they will now have to be mindful of the distinction between academic debate and research integrity, and also aware of the great importance of academic freedom.

Dr E.J. Daalder, Chair

1. Composition of the LOWI in 2024

The LOWI Advisory Committee (LOWI) comprised the following members in 2024:

Dr E.J. Daalder, Chair	Administrative law	Dutch Council of State
Prof. H.E. Bröring, Deputy chair	Administrative law	University of Groningen
Prof. J.G. van Erp	Regulatory governance	Utrecht University
Dr J. Tjldink	Psychiatry	Amsterdam University Medical Centre
Prof. H.G. Brunner	Genetics	Radboud University Medical Centre
Dr P. Vuijk	Educational psychology	Rotterdam University of Applied Sciences
Prof. N.P. Landsman	Mathematical physics	Radboud University
Prof. Sonja Smets	Logic and Epistemology	University of Amsterdam
Prof. Stijn Reijnders	History and Culture	Erasmus University Rotterdam

Profiles of the LOWI members, along with details of their ancillary activities, can be found on our website.

2. Status

The LOWI is governed by Stichting LOWI, a foundation that also publishes an annual report. We refer to this foundation's [annual report](#) (in Dutch) for more information.

3. Tasks

The LOWI is an independent advisory body within the complaints procedure for investigating alleged research misconduct. It advises affiliated institutions that conduct scientific and other academic research. Rather than issuing advisory opinions at its own initiative, it issues them only on request. It assesses whether the institution's RIC conducted its complaints procedure with due care, whether research integrity standards were breached and, if so, how such breaches should be categorised. Based on the LOWI's advisory opinion, the relevant institution's board then issues a final ruling on whether a researcher breached the applicable standards.

4. Affiliated institutions

The following institutions were affiliated to the LOWI in 2024:

- the founders – the Royal Netherlands Academy of Arts and Sciences (KNAW), the Dutch Research Council (NWO) and Universities of the Netherlands (UNL, formerly VSNU)
- the public and special universities, including the university medical centres and the Open University
- Sanquin Blood Supply Foundation
- University of Humanistic Studies
- National Institute for Public Health and the Environment (RIVM)
- Wageningen Research Foundation
- Netherlands Institute for Health Services Research (NIVEL)
- Theological University of Apeldoorn (TUA)
- Utrecht Theological University (TUU) (formerly TU Kampen)
- Protestant Theological University (PThU)
- Princess Máxima Center for Pediatric Oncology

- Royal Netherlands Meteorological Institute (KNMI)
- Nyenrode Business University (NBU)
- Research and Documentation Centre (WODC)
- Netherlands Bureau for Economic Policy Analysis (CPB)
- Netherlands Environmental Assessment Agency (PBL)
- Netherlands Institute for Social Research (SCP)
- Netherlands Association of Universities of Applied Sciences
- Netherlands Organisation for Health Research and Development (ZonMw)
- Netherlands Institute for Transport Policy Analysis (KiM)
- Netherlands Cancer Institute (NKI)

5. Advisory opinions issued in 2024

[Advisory Opinion 2024-23](#)

The researcher in this case combined being employed by a consultancy with a part-time endowed professorship. Having assessed all the relevant facts and circumstances, the LOWI concluded that the standards set in the Code of Conduct were not applicable. The circumstances in this case differed from those in the LOWI Advisory Opinion 2021-20.

[Advisory Opinion 2024-22](#)

In this case, research had been commissioned by a government body. The complaint was considered to be unfounded. The case concerned a substantive difference in opinion between researchers rather than a possible breach of research integrity.

[Advisory Opinion 2024-21](#)

This case concerned research commissioned by a government body. The LOWI advised that the complaint should be declared inadmissible on the grounds of the complainant's breach of the duty of confidentiality.

[Advisory Opinion 2024-20](#)

This case concerned a complaint about an RIVM factsheet. Standards set in the Code of Conduct apply only insofar as can reasonably be required. The wording of the factsheet was not found to have been compiled without due care.

[Advisory Opinion 2024-19](#)

An application for a Veni grant was not found to contain plagiarism of either text or ideas. Researchers who are the subject of a complaint may disclose information to their supervisors in confidence. This should not be prevented by the duty of confidentiality.

[Decision 2024-18](#)

A petition submitted after the deadline was found to be inadmissible. LOWI endorsed the advice of the RIC (needless to say). This case related to the appointment of a professor. The Code of Conduct is not applicable to such matters.

[Advisory Opinions 2024-15, 2024-16 and 2024-17](#)

A conflict between a PhD candidate (in medicine) and a project group led to a complaint being submitted by each party. While the LOWI regarded two elements of the project group's complaint about the PhD candidate (regarding authorship) as well-founded and constituting questionable conduct, it did not regard them as a breach of research integrity. The PhD candidate's countercomplaints about the project group were declared unfounded.

[Advisory Opinion 2024-14](#)

This case, involving a question of authorship and the course of events surrounding a PhD track, was declared unfounded.

[Advisory Opinions 2024-12 and 2024-13](#)

Decisions by a Faculty Ethical Review Committee do not fall within the scope of the Code of Conduct. While such decisions have consequences for academic research, they do not in themselves constitute part of academic practice. Similarly, the administrative action taken by the dean did not fall within the scope of the Code of Conduct.

[Advisory Opinion 2024-11](#)

This case concerned a complaint about research into the SARS-CoV-2 virus. The LOWI's advisory opinion differed substantially from the RIC's advice because of additional information regarding the establishing of the facts. On more principle-based grounds, too, the LOWI's advisory opinion deviated from that of the RIC because the LOWI categorised several aspects of the complaint as a professional difference of opinion and part of the academic debate, rather than as the subject of a complaints procedure.

[Advisory Opinion 2024-10](#)

The complaint in this case was found not to have been handled with due care. The confidential adviser's responsibilities were found to be insufficiently separate from those of the Scientific Integrity Complaints Procedure (RIC). The principle of hearing both sides of the argument failed, incorrectly, to be applied. The LOWI advised that the complaint should be reinvestigated and the complaints procedure reviewed.

[Advisory Opinions 2024-08 and 2024-09](#)

A report commissioned by a commercial party was found to accord with the standards of research integrity. The complaints procedure is not the appropriate means for criticising research quality. No serious grounds for hearing the parties separately were found. The parties were wrongly not given the opportunity to respond to the committee's report on the other parties' hearing (of which they were not a part).

[Advisory Opinion 2024-07](#)

The university was found not to have academic responsibility for the conduct of the Interested Party. The Royal Netherlands Academy of Arts and Sciences, however, was found to be responsible for this. The complaint was found to be inadmissible (see also 2024-08 and 2024-09)

[Advisory Opinion 2024-06](#)

This case would seem primarily to constitute a dispute between the directors of a business. Such disputes should not seek to be resolved as if they were matters of research integrity. RICs and the LOWI are not authorised to rule on intellectual property law.

[Advisory Opinion 2024-05](#)

The Co-Principal Investigator was wrongly excluded from the grant application. No plagiarism was found to have been committed. The LOWI categorised the breach of standards as constituting questionable conduct on the part of all the researchers, including the associate professors not wanting to participate in the LOWI procedure.

[Advisory Opinion 2024-04](#)

The publication restrictions imposed on the petitioner were not found to result in a breach of standard 58 in the Code of Conduct ('Do not delay or hinder the work of other researchers in an inappropriate manner.'). LOWI advised on how to proceed and on the institution's duty of care.

[Advisory Opinion 2024-03](#)

A former co-supervisor complained *inter alia* that an external PhD candidate's thesis included insufficient references to the origin of texts and his own previously published work. With one exception (where a reference was found to be missing from a chapter of the thesis), the complaints were ruled to be unfounded. This conduct was regarded as being of minor significance and was categorised as insufficiently scrupulous (Code of Conduct 2014).

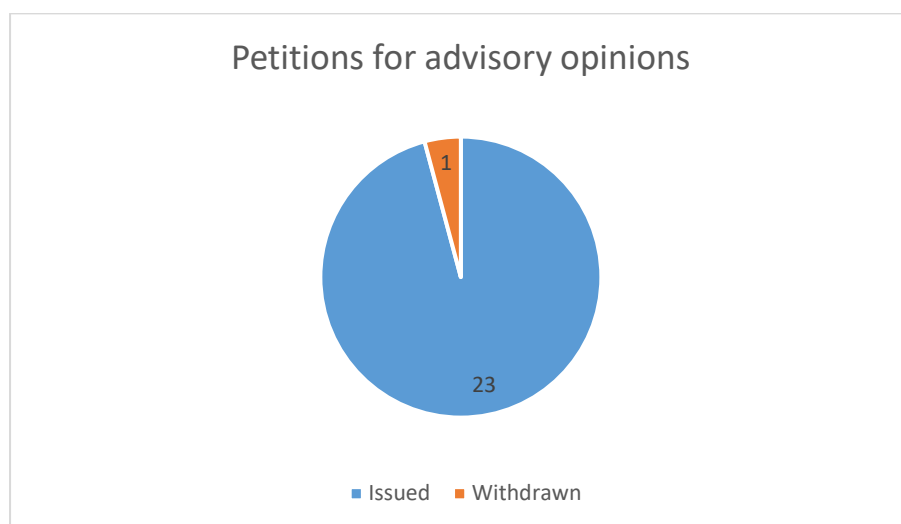
[Advisory Opinion 2024-02](#)

This case concerned an interpretation of the 2018 Netherlands Code of Conduct for Research Integrity. A complaints procedure is applicable only to research by students that results in academic publications, whereby it should be noted that a published Master's thesis is not regarded as constituting such a publication.

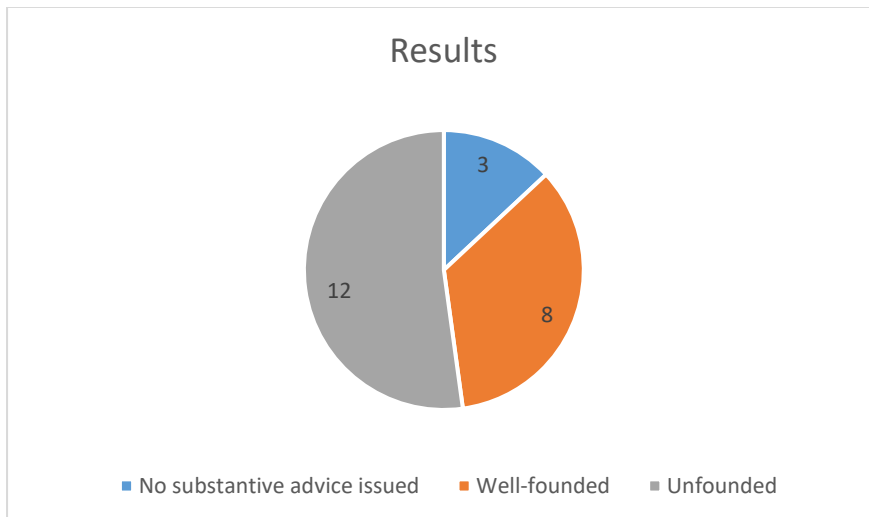
[Advisory Opinion 2024-01](#)

The petitioners' lawyer was found to have breached the duty of confidentiality. Given the nature and low severity of the breach of the duty of confidentiality in this case, deciding to stop handling the complaint was found to be disproportional.

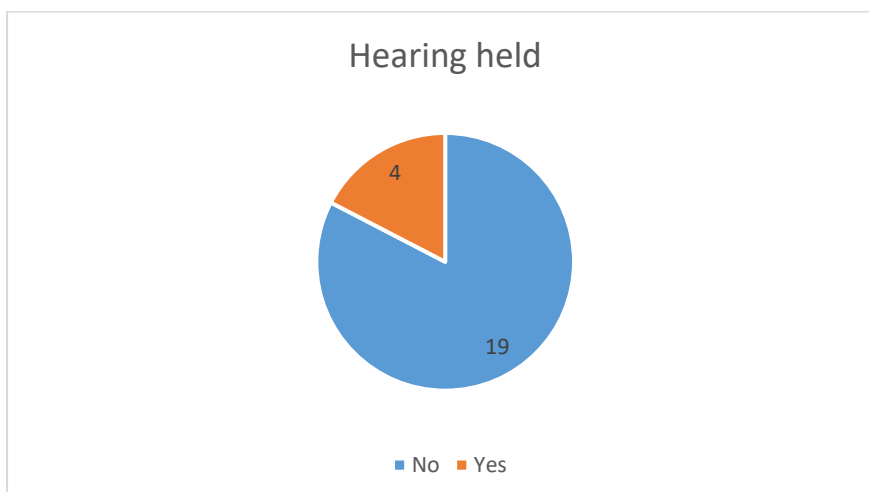
6. 2024 in figures



The 23 advisory opinions issued in 2024 were issued in response to 12 petitions for an advisory opinion received in 2023 and 11 petitions for an advisory opinion received in 2024. A total of 15 petitions for an advisory opinion were received in 2024. The handling of 4 cases had still to be completed as at 31 December 2024.

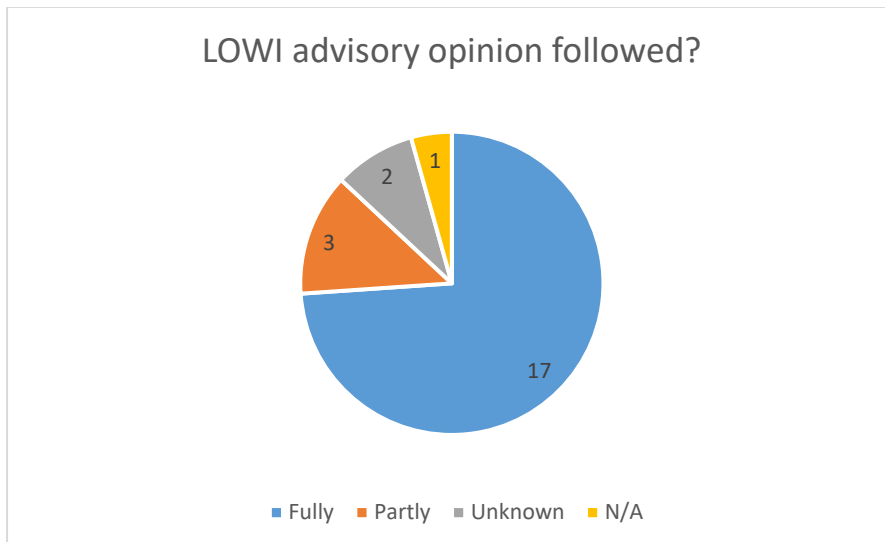


The LOWI issued 23 advisory opinions in 2024. In 3 of these cases, the LOWI did not issue any substantive advice.¹ Substantive advice was issued in 20 cases, 8 of which were declared well-founded. In relative terms, this is slightly below the number declared to be well-founded in 2023, when 8 of the 16 petitions for an advisory opinion on which substantive advice was issued were declared to be well-founded.



More hearings were scheduled in 2024 than in 2023.

¹ 2024-18: the petition was declared inadmissible; 2024-01: it was advised to continue investigating the complaint despite the breach of the duty of confidentiality; 2024-21: it was advised to declare the complaint inadmissible because of a breach of the duty of confidentiality.



In 2024, the advice in the LOWI advisory opinions was fully followed in 17 cases, and partly followed in 3 cases. In case 2024-18, the petition was declared inadmissible and the LOWI did not issue an advisory opinion. This case is shown as 'N/A' in the above diagram. In addition, and despite several reminders, the boards of the relevant research institutions in cases 2024-04 and 2024-11 failed to notify the LOWI of the extent to which its advice had been followed.

Handling times



Source: vecteezy.com

The average time for handling petitions for advisory opinions in 2024 was 21 weeks, which was almost the same as in 2023.