

Annual Report 2025 – LOWI Advisory Committee



LOWI Report on the Year 2025

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

Foreword

The committee set up to establish whether the 2018 Netherlands Code of Conduct for Research Integrity ('the 2018 Code of Conduct') continued to comply with the standards that can be expected of such a code published its report in 2024. In its report, the committee also considered societal developments such as the use of AI and changing views on socially safe working environments and diversity in relation to research integrity. The committee recommended revising the current Code of Conduct, while retaining the aspects regarded as strengths. Following publication of various proposed amendments, the drafting committee has now submitted a provisional final draft of the new Code of Conduct to the relevant parties and research institutions for approval. This revised Code of Conduct is expected to come into force in January 2027.

Like the 2018 Code of Conduct, the revised Code of Conduct is based on a set of guiding principles. The standards for good research practice set out in the 2018 Code of Conduct have been replaced in the revised Code of Conduct by a reduced number of standards, some of which have also been reworded. Although the total number has been reduced, the standards set out in the revised Code of Conduct are still sufficiently numerous to ensure that the grounds available to parties potentially wishing to submit a complaint about research practices remain sufficiently broad-ranging.

The LOWI used the opportunity offered by the drafting committee to express its views on the proposed revision of the Code of Conduct. A version of the revised Code of Conduct submitted by the drafting committee for consultative purposes proposed, for example, that the option to categorise non-compliance with research standards as 'research misconduct' should be the only option to remain available and that it should no longer be possible to categorise less serious breaches of standards as 'questionable research practices' or 'minor shortcomings'. Any complaints not ultimately categorised as 'research misconduct' would then have to be declared unfounded. The drafting committee was seeking in this way to raise the bar for bringing complaints.

While the LOWI, too, acknowledges that quite some complaints do not relate to traditional violations of research integrity, such as plagiarism and falsification or fabrication of data, we believe, and made this known to the drafting committee, that restricting the possible categorisations would mean it would no longer be possible to express a nuanced view on confirmed violations of research integrity and to categorise them accordingly. This would unnecessarily limit the opportunities available to the LOWI to interpret the new standards and to issue a differentiated ruling reflecting the specific nature and circumstances of the breach. This, in turn, could adversely impact on the LOWI's advisory role. We are pleased to report that the drafting committee has followed the LOWI's advice on this matter.

Once the revised Code of Conduct comes into force, the LOWI will have to consider the new standards in its advisory opinions, while often also being able to refer to advisory opinions previously issued with regard to the same or comparable standards. Questions were recently raised in parliament regarding the fact that the 2018 Code of Conduct no longer makes reference to 'establishing the facts' and 'objectivity' as standards for research integrity, whereas these were still applicable in the 2014 Code of Conduct for Academic Practice. The Minister of Education, Culture and Science responded as follows: 'The 2018 Netherlands Code of Conduct for Research Integrity is based on five fundamental principles: honesty, scrupulousness, transparency, independence and responsibility, and does not refer to normative standards or key concepts. These principles largely align with the principles in the 2014 Code of Conduct. Both codes of conduct elaborate on the principles; while the 2014 Code of Conduct uses the words 'objectivity' and 'establishing the facts', the 2018 Code

uses other words in its elaboration of the principles.¹

It is evident to the LOWI that the standards in the existing Code of Conduct and the new standards are all clearly intended to ensure that academic research is conducted honestly and objectively and result in academically sound conclusions. Conclusions reached in academic research are inherently required to be based on careful and scrupulous investigations. However, academic research can obviously produce varying results, and opinions on these results may differ. Academic debate is the forum for discussing these differing opinions, and the need for this debate should be respected. This is an important point to emphasise, given that the LOWI regularly receives complaints that, in essence, concern research results with which the complainant does not agree. The LOWI often then has to conclude that the complaint relates to academic differences of opinion,² for which the complaints procedure for research integrity is not intended to be used.

Dr E.J. Daalder, Chair

¹ See <https://www.openkamer.org/kamervraag/2026Z08372/>.

² See, for example, <https://lowi.nl/advies-2025-16/>.

1. Composition of the LOWI in 2025

The LOWI Advisory Committee (LOWI) comprised the following members in 2025:

Dr E.J. (Eric) Daalder, Chair	Administrative law	Dutch Council of State
Prof. H.E. (Herman) Bröring, Deputy chair	Administrative law	University of Groningen
Prof. J.G. (Judith) van Erp	Regulatory governance	Utrecht University
Dr J.K. (Joeri) Tijdink	Psychiatry	Amsterdam University Medical Centre
Prof. H.G. (Han) Brunner	Genetics	Radboud University Medical Centre
Dr P. (Patricia) Vuijk (<i>until 1 Aug. 2025</i>)	Educational psychology	Rotterdam University of Applied Sciences
Prof. N.P. (Klaas) Landsman	Mathematical physics	Radboud University
Prof. S.J.L. (Sonja) Smets	Logic and Epistemology	University of Amsterdam
Prof. S. (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 research integrity committee (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 2025:

- the founders – the Royal Netherlands Academy of Arts and Sciences (KNAW), the Dutch Research Council (NWO) and the Universities of the Netherlands (UNL)
- 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 Kampen Theological University*)
- Protestant Theological University (PThU)
- Princess Máxima Center for Pediatric Oncology
- Royal Netherlands Meteorological Institute (KNMI)
- Nyenrode Business University (NBU)

- Research and Data 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 2025

[Advisory opinion 2025-18](#)

In this case, a researcher's statements in the public debate failed to comply sufficiently with the standards set in the Code of Conduct. This was categorised as a minor shortcoming.

[Advisory opinion 2025-17](#)

The RIC and LOWI cannot assess risks considered unacceptable to humans in research involving human subjects. This is the responsibility of the medical ethics committee (METC). Standard 7 does not require disclosure of the co-funder during the design phase of research. However, this is mandatory when reporting results (standard 44).

[Advisory opinion 2025-16](#)

A complaint about research of social relevance was found largely to trace back to a difference of opinion that was not appropriate for handling in the procedure for complaints regarding academic integrity. The advisory opinion also addressed the question of research independence.

[Advisory opinion 2025-15](#)

This case involved a discourse analysis. The article that was the subject of the complaint was not found to be so lacking in care as to constitute a breach of the standards set in the Code of Conduct. The procedure for assessing alleged research misconduct is not intended for discussion of an article's academic quality.

[Advisory opinion 2025-14](#)

The complaint in this case related to 'advice provided by researchers', as referred to in the Code of Conduct. The petition contained a compelling argument as to why the advice provided by the researcher in question was incorrect. However, the complaints procedure for investigating alleged research misconduct is not the appropriate forum for assessing the correctness of such advice.

[Advisory opinion 2025-13](#)

The complaint in this case was declared inadmissible because (1) it concerned a PhD thesis from more than 10 years earlier and (2) the other acts complained about were performed by the interested party in a different professional capacity (i.e. as a civil servant), to which the Code of Conduct does not apply.

[Advisory opinion 2025-12](#)

This complaint concerned a conflict dating back to 2016. The university's complaints procedure stipulates a five-year period. It was not possible, therefore, to file a complaint nine years later.

[Advisory opinion 2025-11](#)

The complaint in this case was filed by a former PhD candidate. The advice issued was that the complaint should be declared inadmissible because the conflict was governed by the PhD Regulations and not by the Code of Conduct.

[Decision 2025-10](#)

The petition was declared inadmissible because it was filed too late. There was no question of an exceptional situation. If important e-mails often fail to reach the petitioner, that is a matter for which the petitioner himself is responsible.

[Advisory opinion 2025-09](#)

This case concerned an authorship issue relating to social safety. The LOWI upheld the decision that the researcher in question may be offered standard authorship, but due to circumstances was not allowed to be a senior (last) or corresponding author.

[Advisory opinion 2025-08](#)

A complaint about publications from around 20 years earlier was declared inadmissible. A complaint about a debate in the academic forum was declared unfounded because the issue at stake constituted a professional difference of opinion and not a matter of research integrity.

[Decision 2025-07](#)

This case, involving plagiarism, was handled by the universities without the person who reported the plagiarism and who did not want to be involved in the dispute. The petition submitted to the LOWI was declared inadmissible.

[Advisory opinion 2025-06](#)

In this case, the failure to report the fact that the PhD candidate simultaneously had several PhD positions at different Dutch universities was considered to constitute conduct lacking in transparency. However, it did not constitute research misconduct.

[Advisory opinion 2025-05](#)

A manual was not found to contain plagiarism.

[Advisory opinion 2025-04](#)

In this case, the professor in question was completely free not to act as a candidate's PhD supervisor because he did not think the research proposal was good enough and he had too little time. These activities did not constitute supervision as referred to in the Code of Conduct.

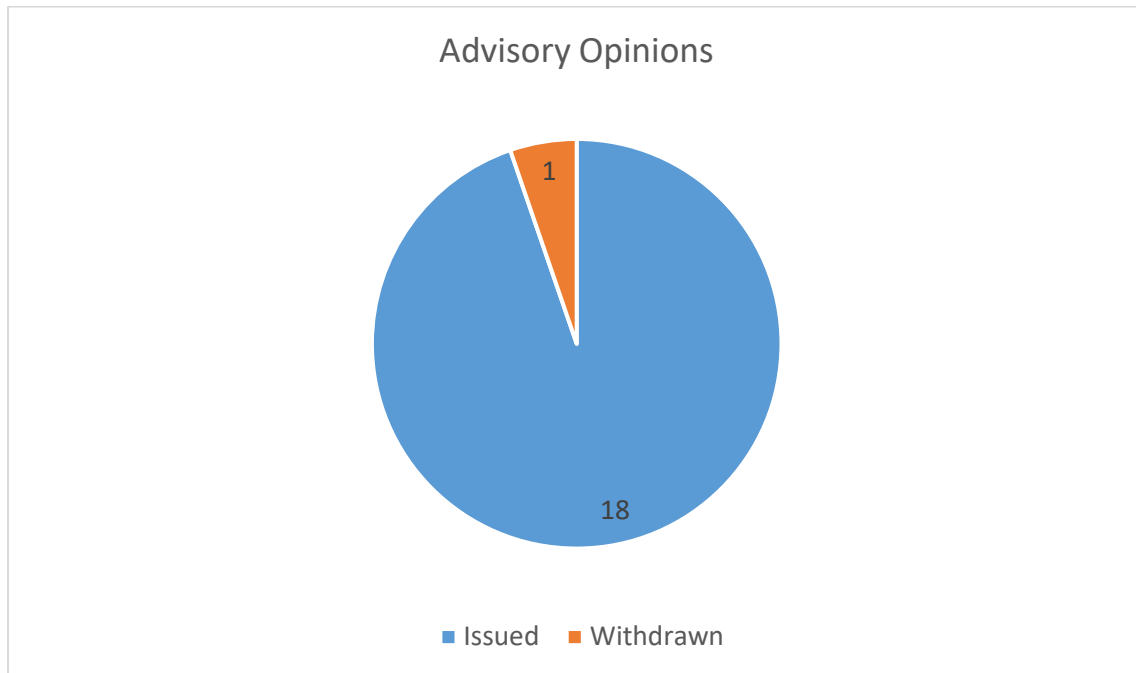
[Advisory opinion 2025-03](#)

The university board rightly decided not to handle a complaint about an independent advisory board.

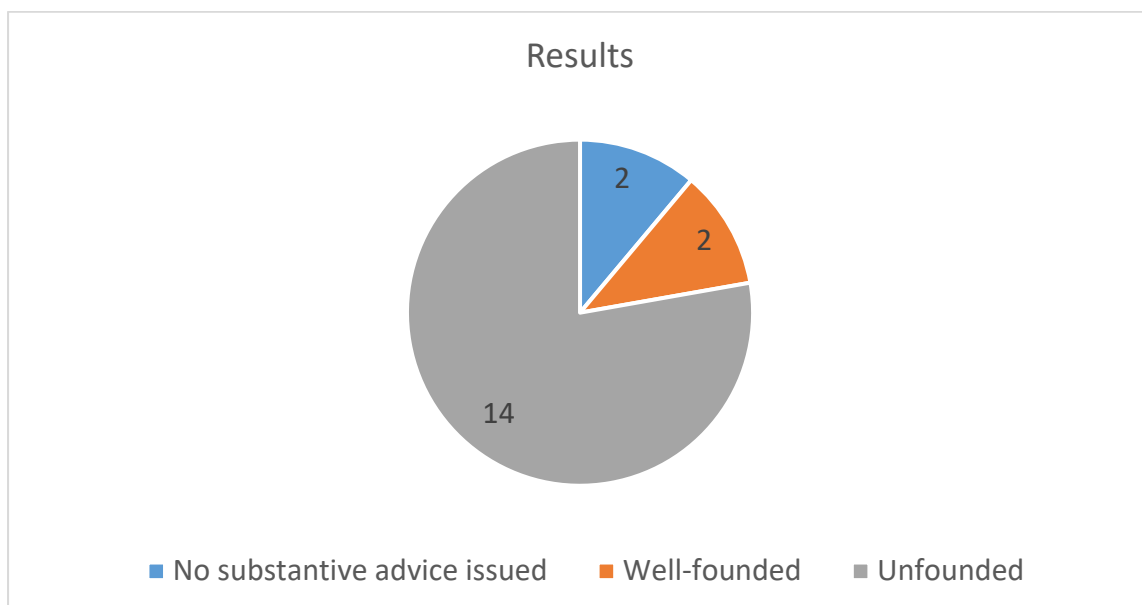
[Advisory opinions 2025-01 and 2025-02](#)

In this case, the complaint filed against the research institution was declared inadmissible. The complaint filed against an individual was declared unfounded because it was not imputable to the defendant as a breach of the standards set in the Code of Conduct. This did not alter the fact that the grant application contained an unfounded claim. LOWI advised sharing the advisory opinions with the grant provider for information purposes.

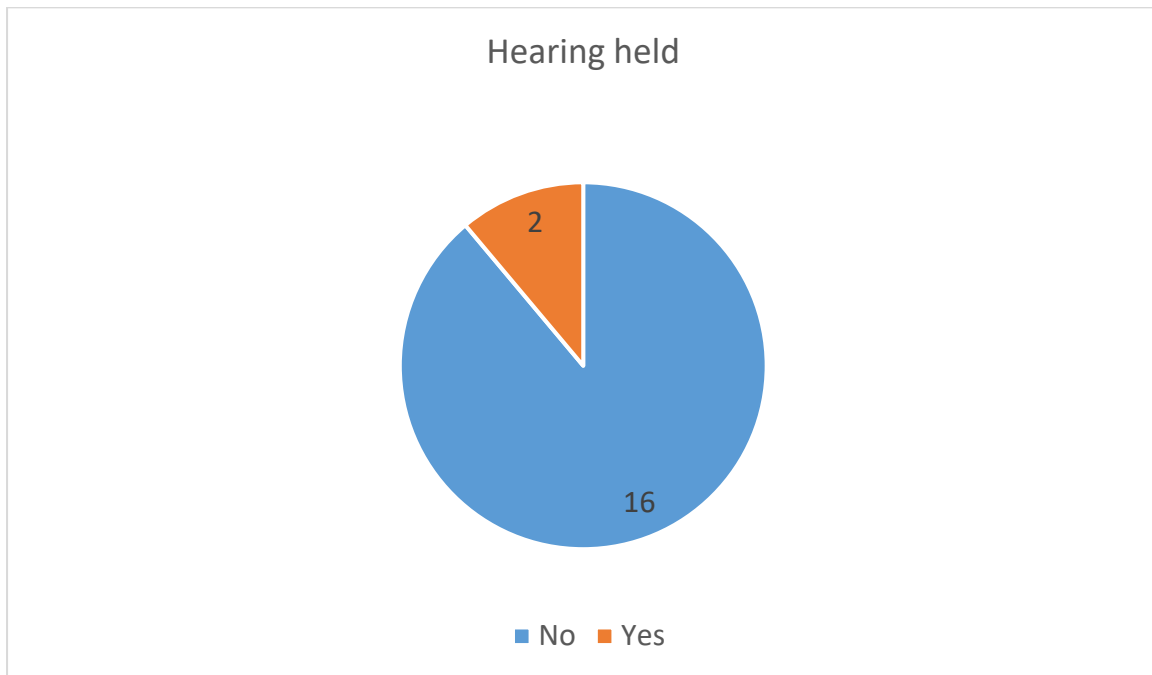
6. 2025 in figures



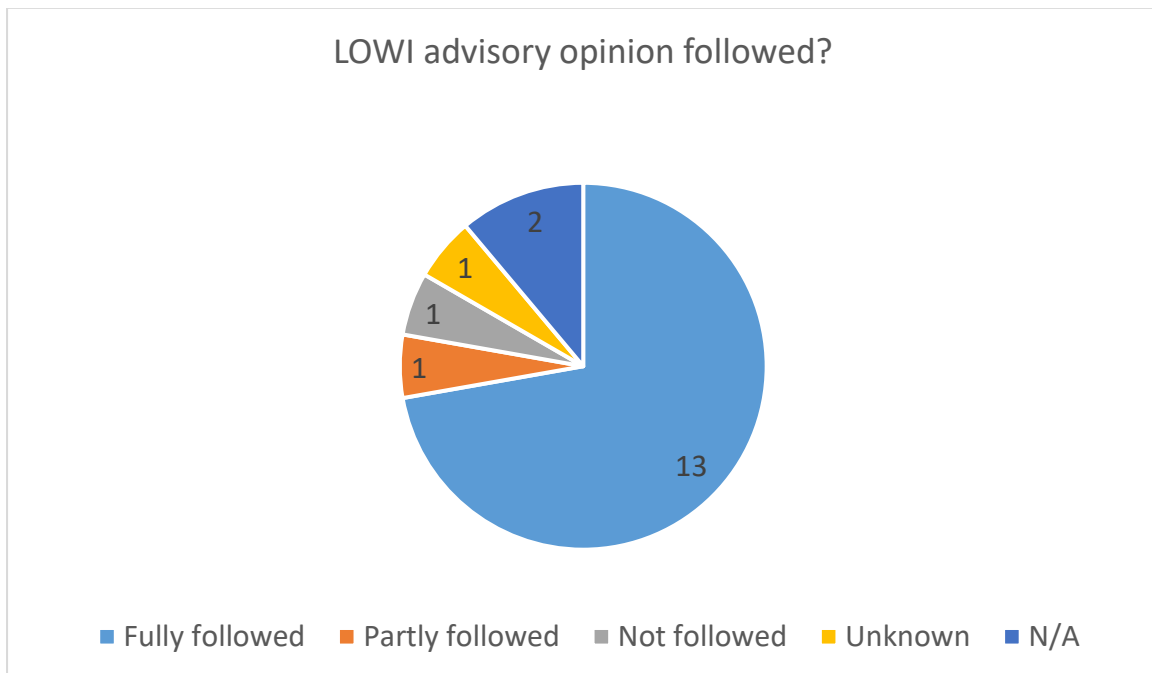
The 18 advisory opinions issued in 2025 were issued in response to 4 petitions for an advisory opinion received in 2024 and 14 petitions for an advisory opinion received in 2025. A total of 23 petitions for an advisory opinion were received in 2025. The handling of 8 cases was still to be completed as at 31 December 2025, while one of the petitions for an advisory opinion received in 2025 was ultimately withdrawn.



In 2025, the LOWI issued 16 advisory opinions and 2 decisions not to issue an advisory opinion. In these 2 decisions, the petitions were declared inadmissible. Substantive advice was issued in 16 cases, of which 2 were declared well-founded. This is considerably lower than the number declared to be well-founded in 2024, when 8 of the 20 petitions for an advisory opinion on which substantive advice was issued were declared to be well-founded.



Fewer hearings were scheduled in 2025 than in 2024.



In 2025, the advice in the LOWI advisory opinions was fully followed in 13 cases and partly followed in 1 case, while in 1 case the advice was not followed. In cases 2025-07 and 2025-10, the petition was declared inadmissible and the LOWI did not issue an advisory opinion. These cases are shown as 'N/A' in the above diagram. In case 2025-18, the board of the relevant research institution has not notified the LOWI as to whether its advice was followed.

Handling times



Source: vecteezy.com

The average time for handling petitions for advisory opinions in 2025 was 15 weeks, which was considerably shorter than in 2024, when the average handling time was 21 weeks. There were various reasons for this, including the fact that fewer hearings were scheduled in 2025. In addition, fewer requests to extend deadlines were received, while it was also decided in various cases not to continue the written proceedings because the documents exchanged made it immediately clear that a petition would be unfounded.