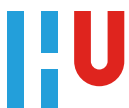


INTEGRITY CODE

For students and employees

November 2024

Adopted by the Executive Board (CvB) on 17 April 2024
with consent of the University Council (HSR) on 24 January 2024



UNIVERSITY
OF APPLIED
SCIENCES
UTRECHT

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FOREWORD

By the Executive Board

As an ambitious university of applied sciences in a dynamic environment, HU University of Applied Sciences Utrecht (HU) works with high-quality education and research on innovation and professionalisation of professional practice and talent development. That is how we contribute to the social, cultural and economic development of an open, just and sustainable society. As the HU, we fulfil an important social role as such and are a morally formative institute.

An institute that is also largely financed with public funds. An institute that students, employees and society should therefore be able to fully rely on. Integrity is an essential prerequisite for this trust. The HU is vulnerable in this respect, for example due to the intensive interaction between lecturers and students, the practice-oriented research and the collaboration between education, research and professional practice. But also because of the many sensitive (personal) data we work with. Moreover, society is placing increasingly higher demands on our (scientific) integrity. The risk of damage in the event of an incident is therefore high for the HU.

It is therefore important that we as the HU continue to work on integrity awareness and a shared sense of integrity. That is why we maintain an integrated integrity policy. In line with the model of the former BIOS¹ this integrity policy focuses not only on establishing and enforcing rules and safeguarding integrity within our work processes, but especially on stimulating moral awareness among employees and students, strengthening moral competence and promoting an open culture. A culture in which students, lecturers, support staff, researchers and administrators are able to form moral judgements. Where dilemmas are shared, doubts are discussed and we give each other feedback.

This integrity code describes the HU integrity principles that we, as the Executive Board, endorse and embrace. The code also describes our standards and rules in the field of integrity and how there is continued attention for integrity within the HU. The Integrity Code therefore forms the starting point for a good conversation about integrity and for joint standard-setting. Together and with our partners, we, as the HU community, give substance to integrity.

This code will be evaluated after one year in collaboration with the University Council. This evaluation will focus on:

- a good conversation and any support that is still needed for managers, employees and students to have this conversation with each other.
- The completeness of the Integrity Code and the use of the Regulations for Reporting Suspected Integrity Violations when it comes to issues of integrity. What scope or obstacles have been identified for the integrity issues mentioned and to what extent would any adjustments still need to be made to the code or regulations?
- The sense of safety for all parties involved when raising an integrity issue.

¹ BIOS stands for *Bureau integriteitsbevordering openbare sector* (National Office for Promoting Ethics and Integrity in the Public Sector). BIOS merged into the Whistleblowers Authority in 2016.

1. INTRODUCTION

1.1 Purpose of the Integrity Code

This Integrity Code is the starting point for a good conversation about integrity. This conversation can take place within your team, your study programme or in collaboration with partners outside the HU. Together we define what integrity means for the HU.

In addition, this Integrity Code provides a testing framework for ethical conduct. The Integrity Code can be applied when making a decision in a specific situation. This does not mean that the Integrity Code covers all situations. What constitutes ethical behaviour cannot be viewed separately from the context in which that behaviour takes place.

Within the HU, a number of regulations are in force that describe a procedure for investigating an integrity-related complaint or report. For each report or complaint, it must be assessed which of these procedures is (best) applicable.

- Regulations for Reporting Suspected Integrity Violations
- Regulations for Reporting Suspected Misconduct
- Regulations for Inappropriate Conduct
- Scientific Integrity Regulations
- The GDPR procedure
- HU Legal Protection for Students Regulations
- The Education and Examination Regulations (OER, *Onderwijs- en Examenregeling*).

Furthermore, the Integrity Code describes how we pay attention to integrity within the HU and what the options are when integrity is compromised. These are facilities where you can go for advice or to make a report.

1.2 Integrity Code Target Group

The integrity of the HU is reflected in the actions of all employees and students. This Integrity Code therefore applies to all of them. Where this Integrity Code refers to employees, it also includes student trainees and staff who are not employed, such as temporary workers, seconded workers, self-employed professionals, etc. In short, anyone who acts on behalf of the HU.

Members of the Executive Board endorse this code and also act in accordance with (among others) the Sector Code for Good Governance of the Netherlands Association of Universities of Applied Sciences.

What may we expect from each other?

The HU's responsibility for integrity does not end with the drafting of this Integrity Code. As a 'good employer', the HU also has a duty of care for its employees, and as a trainer it also has a duty of care for its students. This means that the HU protects employees and students against integrity risks, that it organises its organisation and work processes accordingly and that it makes provisions for the event that an employee or student has a question, dilemma or suspicion. As a good employer, the HU also ensures that integrity remains in the spotlight.

The HU expects its employees and students to be familiar with the Integrity Code and to comply with it. Employees of the HU are required to behave as 'good employees' under the collective labour agreement for higher professional education. The HU also expects other employees and students to behave as a 'good employee' or 'good student'. Our integrity principles and standards in the Integrity Code give substance to these concepts.

Both employees and students, in their role as HU employee or student, often have contacts outside the HU organisation. Consider partners in the professional field for internships, research partners, guest lecturers or external suppliers of goods or services. The HU believes it is important that our partners also act in accordance with the principles and standards laid down in this Integrity Code. We expect our employees and students to be aware of this and, if necessary, to discuss it when entering into external relationships and in collaboration with partners.

2. OUR INTEGRITY PRINCIPLES

The HU is developing into an agile organisation with fewer and fewer rules and procedures. An organisation where responsibilities are placed as low as possible in the organisation. Moreover, as the HU we are part of a network in which boundaries between students, lecturers, professional practice and other partners are becoming increasingly fluid.

More room to act requires support and certainty in making decisions, especially when it comes to the moral dimension of our work or studies. Often a situation is not black or white and a rule does not immediately provide a concrete answer to the question that arises in the relevant situation. In such cases, the HU integrity principles may provide guidance. These principles help in making decisions in specific situations and form the starting point for joint standard-setting. (What is careful in this case? Are there limits to transparency? How can we deal with this in a fair and respectful way?).

Employees and students are expected to act in accordance with the HU integrity principles.

Accurate

You are *aware of your tasks and responsibilities and the context* in which you operate. You are prepared, know the relevant facts, circumstances and interests, and make a decision based on that. You act *professionally*, as may be expected of you as a lecturer, researcher, support staff member or student. This also means that you act in accordance with the applicable rules and professional codes and the [Netherlands Code of Conduct for Research Integrity](#)².

Transparent

You are always able to *explain* why your actions are in accordance with the integrity principles and standards that apply within the HU. Moreover, you are willing to do so. Not only when asked, but also proactively. In addition, you discuss complicated matters or dilemmas and ask for advice if necessary.

Responsible

You are *involved*, do not hide and are prepared to make difficult decisions. You don't make excuses, but take responsibility for your actions. Moreover, you can be *held accountable*, even as a manager. If necessary, *address* a colleague or (fellow) student about their behaviour.

Reliable

You do what you say and say what you do; you stick to your agreements. A student must be able to rely on a lecturer's commitment, and the same applies the other way around. In addition, you are *steadfast* and you demonstrate *resilience* against influences and pressure from outside (third parties, parties with commercial or other interests) and from within (management, student or lecturer).

2 Not applicable to student research

Just

You treat equal cases *equally*. It doesn't matter who it concerns. You approach others *without prejudice* and take the trouble to put yourself in their shoes. In addition, you treat employees and (fellow) students with *respect*, regardless of position, competences, opinion, character, origin or gender. You show this respect both within the HU and externally, physically, verbally and in writing, online and offline.

3. MORAL STANDARDS AND REGULATIONS

Within the HU, rules apply regarding integrity. These rules can be divided into three categories:

1. Dealing with interests
2. Interaction with each other
3. Handling information, data and resources

We explain here what we mean by this and which regulations apply.

3.1 Dealing with interests

The boundaries between HU students and employees on the one hand, and our partners and professional practice on the other, are blurring. As the HU, we are part of a network within which interests can differ. It is important to be aware of this as employees and students.

For employees, the interests of the HU must be central in their work. This means that your choices, actions and decisions may not be influenced by personal interests that conflict with the interests of the HU. It is primarily up to you as an employee to be alert to this. If such a personal interest (possibly) plays a role in the performance of your work, you as an employee must report this to your manager.

A personal interest, contrary to what the term might suggest, does not exclusively concern a (direct) personal benefit to yourself. For example, it could also relate to your partner or an acquaintance who benefits from a certain choice, decision or (lack of) action. Or preferential treatment from an organisation to which you are affiliated as a researcher.

Ancillary activities and positions

The connection with professional practice is essential for the quality of HU education. We therefore welcome the fact that employees have jobs in professional practice alongside their employment at the HU. However, it is important to carefully consider how these and other ancillary activities (e.g. a research appointment at a university, your own consulting firm or a board position at an association) relate to your work for the HU.

Are you employed by the HU and do you perform ancillary activities that are related to your work and professionalism? In that case, a reporting and registration obligation (of the scope and content of the work) applies on the basis of the *collective labour agreement for higher professional education*.

For every HU employee, regardless of whether you are a salaried employee, the following applies: you may not carry out ancillary activities that demonstrably harm the performance of your job or the interests of the HU. If you have any doubts about this, discuss it with your manager.

Questions to help with this assessment include:

- Are there similarities with your position and field of work at the HU?
- Do you deal with the same network (people, companies and institutes) as in your position at the HU?
- Did you obtain the ancillary activities through your position at the HU?

- Do you use, or benefit from, information or specific knowledge from your position at the HU?
- How extensive are the ancillary activities in terms of time and/or earnings?
- What is the reputation of the organisation, industry or person for whom you perform the ancillary activities?
- How might your ancillary activities be viewed in the public space?

Decision-making by the Executive Board and Supervisory Board

The articles of association of the Hogeschool Utrecht Foundation (2022) state that a board member will not participate in decision-making if a personal interest conflicts with the HU interest.

For members of the Supervisory Board, the articles of association of the Hogeschool Utrecht Foundation (2022) stipulate that if the members foresee that the interests of the HU may conflict with a personal interest, they will not participate in the deliberations and decision-making.

Employees are not allowed to participate in the preparation of decision-making by the Executive Board or the Supervisory Board if they have a personal interest in doing so. If you have any doubts about this, please consult your manager.

Procurement, hiring and tendering

As a contracting authority, the HU must comply with *procurement legislation*. We also have our own purchasing policy and comply with the NEVI Code of Conduct. These standards are important for everyone within the HU who is involved in purchasing, hiring or tenders. For example, this also applies to employees who draw up a programme of requirements, or to an employee who nominates someone from their network for hiring or the delivery of goods. If you are an employee and have to deal with this, make sure that you are well informed about the rules and procedures that apply at that time and that you comply with them.

As the HU, we believe it is important that purchasing, hiring and tendering are carried out independently and we also want to avoid any appearance of unauthorised influence. That is why there are always several people involved in the purchasing, hiring and tendering process. Employees who have private contacts with the other party may therefore not play a role in purchasing, hiring and tendering.

Gifts, services or invitations

It may happen that a student or a business associate offers you something, or that you can make use of certain benefits because of your work. This could be a tangible gift, a service or an invitation to a (work-related) event. There are integrity risks attached to this. For example, someone might try to get you to return the favour. Acceptance of the offer may lead to certain expectations.

Therefore, do not simply accept a gift, service or invitation. Always consider carefully what the reason is; if the reason could be that the person wants or needs something from you, be cautious. If you have any doubts about the intentions, discuss it with your manager. Never accept gifts worth more than € 50.

3.2 Interaction with each other

Within the HU we act in accordance with our integrity principles, we treat each other with respect and we do not (cyber)bully others. In addition, a number of specific standards apply.

Undesirable behaviour

The HU does not tolerate discrimination or undesirable behaviour. Rules on this matter are laid down in the Regulations for Reporting Suspected Inappropriate Conduct. By undesirable behaviour or inappropriate conduct we mean the conscious or unconscious hurting of another person, which can include: gross bullying, verbal, physical and psychological violence, expressions of intolerance, discrimination, fundamentalism, radicalism and extremism, sexual harassment and sexual abuse, where one of the following points also applies:

- submission to such conduct is either explicitly or implicitly used as a condition for the employment of an employee, or admission of a student to a study programme or unit thereof;
- submission to or rejection of such conduct by an employee or student is used or co-used as a basis for decisions affecting the work or studies of that person.
- Such behaviour is intended to:
 - affect the work or study performance of an employee or student, and/or
 - create an intimidating, hostile or unpleasant work or study environment,
 - or has the consequence that:
 - the work or study performance of an employee or student is affected and/or
 - an intimidating, hostile or unpleasant working or study environment is being created.

If you, as an employee, are confronted with undesirable behaviour, you can discuss this with your manager and a [confidential advisor](#). Students who experience undesirable behaviour can contact their study coach, learning team coach or a confidential advisor.

Both employees and students can make a report to [an external Undesirable Behaviour Committee](#). The following applies to everyone: if you witness undesirable behaviour, address the other person or make a report of it.

Affective relationships

Affective relationships between employees and between employees and students may occur. By an affective relationship we mean a relationship with a personal or intimate character. This also includes a close friendship or family bond. HU policy is not to prohibit these relationships. However, we do want to prevent an affective relationship from having negative consequences for the work and mutual relationships. Both between those involved and in collaboration with other students or colleagues.

We expect employees to maintain a professional relationship with students. As an employee, you also do not abuse this relationship. You are aware of the dependency and inequality within the relationship. When an affective relationship develops between a lecturer and a student, you as a lecturer ensure that you do not have to assess the student or make other professional decisions about the student. In that case, as a lecturer, you also report the relationship (confidentially) to your manager, after which additional agreements may be made.

In a relationship between two employees, it is especially important that it does not compromise the professionalism of the work and the working environment. The employees concerned must report the relationship (confidentially) to their manager(s). If necessary, agreements can be made to maintain a professional working environment.

3.3 Handling resources, information and data

As an employee or student you may receive access to or use all kinds of facilities. Think of equipment such as a laptop or smartphone, office supplies, buildings and facilities such as the library, laboratories or classrooms, but also (digital) networks and data. Anyone who uses these facilities for education, research or general business operations must adhere to certain rules of conduct. As a basic rule, you should use these facilities in a careful and responsible manner and take into account any special conditions of use or security regulations.

Buildings and facilities

Internal rules apply within the HU buildings. Anyone using these buildings must adhere to these rules. The internal rules concern how to deal with (the facilities within) the building itself and how to interact with each other. The aim of these internal rules is to contribute to a pleasant and safe HU with a good learning, working and living environment. The internal rules are displayed for everyone to see at the entrance of the building.

ICT resources

Everyone who uses ICT facilities within the HU, such as computers or the network, must adhere to the ICT code of conduct. The starting point of these rules is that general social standards and values are respected. This means, among other things, that:

- Use of the ICT facilities must take place within the limits of the law (in particular, theft, fraud, hacking, copyright infringement and forgery are prohibited);
- The continuity of the primary process and the business operations of the HU must not be jeopardised;
- The dissemination of discriminatory statements is not permitted;
- Activities that could damage the good reputation of the HU are not permitted.

Financial resources and time

As an employee of the HU, you are expected to handle HU financial resources with care. After all, these are (largely public) funds that can only be spent once. In practice, this means that you fulfil your role as client towards external suppliers and service providers in a professional manner. We also expect you to be cautious about incurring costs that are charged to the HU. You only claim business and actual expenses that are not already reimbursed in any other way. As an employee, you also pay due attention to working hours. You act in accordance with the rules regarding this in the collective labour agreement for higher professional education, your employment contract and (any) additional agreements with your manager.

Confidential information

As an employee or student of the HU you are obliged to keep information that you have obtained because of your role or function confidential, when confidentiality has been expressly imposed in writing or when the information is of a confidential nature. It is up to you as an employee or student to decide whether or not information can be shared. If you have any doubts about this, please discuss it with your manager or a lecturer. This obligation of confidentiality also applies if you have stopped working for or studying at the HU. Keeping

information confidential means not intentionally sharing the information with others, but also ensuring that confidential information is not lying around or easily found.

Personal data

At the HU, we attach great importance to the privacy of our students and employees. As an employee of the HU you may be involved in the storage and processing of personal data. This must be carried out with the utmost care, because misuse of personal data can cause a lot of damage to the students or employees involved and to the HU as an organisation. As an employee, you must comply with, among other things, the *General Data Protection Regulation (GDPR)* and the *HU Employee Privacy Statement*. If you have any questions about the handling of personal data, you can contact the *Privacy Officer*.

Copyright and intellectual property

Students and employees must comply with the *Copyright Act* and the HU regulations on this subject. This means, among other things, that you may copy or save short articles for personal use, but not entire books. You may quote and paraphrase, but you must always include a source reference. Within the digital learning environment you can place a link or use works with a (creative commons) license. Sometimes it is difficult to determine what is allowed and what is not. In that case, please ask the *Copyright Check Point* for advice.

Research

HU employees work in accordance with the *Dutch Code of Conduct for Scientific Integrity* and other relevant codes of conduct and legal regulations. This means, among other things, that consent forms are used for respondents and that the Research Ethics Committee assesses whether or not a study should be submitted to the Medical Ethics Review Committee if the Medical Research Human Subjects Act (WMO, *Wet medisch-wetenschappelijk onderzoek met mensen*) prescribes this. In addition, this means that research data complies as much as possible with the FAIR principles (Findable, Accessible, Interoperable, Re-usable) and is stored securely at locations specified by the HU.

When the HU collaborates with external parties, clear agreements are made about property rights and the public availability of data.

4. ATTENTION TO INTEGRITY

Within the HU we pay attention to integrity in various ways. We do this when selecting new employees and during employment at the HU and upon termination of employment. When students start at the HU, but also during their studies.

4.1 Working on integrity

Within the HU we continuously work on strengthening the moral awareness and resilience of our employees. In any case, in the following way:

- We conduct and encourage a good conversation about integrity within the team and among students. About integrity principles, vulnerabilities and actual dilemmas.
- We support the development of resilience and moral competence, including by facilitating moral deliberation in teams.
- Intranet contains accessible information about rules and moral standards, facilities and development opportunities in the field of integrity. With this we work on knowledge and awareness about integrity among students and employees.

Attention to vulnerabilities

Every position within the HU entails vulnerabilities in terms of integrity. Consider the handling of personal data or managing financial resources. An employee's personal circumstances, such as financial problems or certain ancillary activities, can also mean that integrity can be compromised more quickly.

The manager has an important role to assess vulnerabilities within their own department and to take control measures to limit these risks. These may be 'hard' control measures, such as introducing passes or checks, or separation of duties. But also 'soft' measures such as consciously paying attention to integrity in a job interview or work meeting, or organising a moral deliberation session.

As an employee you also have a responsibility in this. Discuss any vulnerabilities you identify with your manager or, if this is difficult, the confidential advisor.

4.2 When integrity is compromised

As an HU employee or student, you are responsible for your own behaviour. We also expect you to hold others accountable for their behaviour when necessary. As an educational institute and employer, the HU has the responsibility to promote and maintain integrity.

It may happen that you encounter something in the area of integrity in your work or training at the HU. For example, you may be faced with a dilemma, feel you have been treated unfairly or suspect that a colleague or fellow student is committing fraud. To all these cases applies: make it a topic of discussion!

If you cannot reach an agreement through mutual consultation, or if this is not possible, you can contact one of the HU facilities in the field of integrity. For advice or support, or to make a report or file a complaint. If you wish, you can also be assisted by a confidential advisor. A third party (other than an employee or student) can also report a suspected violation of integrity. The confidential advisor can also make a report on your behalf.

	Employee	Student
Address and discuss	A good conversation with college, manager, fellow student, teacher	
Advice and support	A manager	Teacher, study career coach, learning team supervisor, counsellor
	Confidential advisor	
	Confidential advisor Scientific Integrity	HU Legal Protection Office
Report	Manager	HU Legal Protection Office
	Director of the department	Study programme manager, institute director
	External Committee for misconduct, integrity violation and inappropriate conduct	
	Scientific Integrity Committee	
	Ombuds Office	

Explanation of the above terms

Advice, support:

a) (Next higher) manager/lecturer/study coach/counsellor

Managers for employees and lecturers or study coaches for students have an important role in promoting integrity. First of all, they have an exemplary function. In addition, managers and lecturers/study coaches play an important role in promoting moral awareness and an open culture. Finally, both managers and lecturers/study coaches have the task of identifying risks and taking measures. This involves identifying vulnerable positions or processes, but also addressing behaviour and, if necessary, imposing sanctions.

As an employee, you can always contact your manager and as a student you can always contact your lecturer/study coach or a counsellor if you have questions or encounter dilemmas in the area of integrity or if you suspect that there has been action that is contrary to integrity standards. They can help you further by providing insight into the steps to be taken if you wish to file a complaint or report.

b) Confidential advisor

The confidential advisor is there to provide a safety net, support and guidance to employees and students in the area of integrity (including undesirable conduct). You can go there with questions about integrity and dilemmas, but also if you become aware

of an integrity risk or a possible integrity violation. Confidential advisors also actively contribute to a socially safe learning and working environment within the HU. They do this by providing information and organising preventive activities. Confidential advisors can also identify undesirable forms of conduct and provide solicited and unsolicited advice to HU management.

c) **Confidential advisor scientific integrity**

The confidential advisor on scientific integrity plays an important role as a point of contact and in possible mediation in the event of questions and reports about scientific integrity and possible violations thereof, as well as about the role of the Scientific Integrity Committee. The confidential advisor can inform you about the procedure for making a report and guide you through this process.

Complaint or report:

d) **The HU Legal Protection Office**

As a student, you can contact the HU Legal Protection Office to report undesirable behaviour, a suspected violation of integrity or a suspected wrongdoing (whistleblower report). The Office will forward your report to the relevant body. If desired, the Office can support you in making a report under the Regulations on Suspected Misconduct.

e) **(Next higher) manager / study programme manager / team leader / director**

If you, as an employee or student, suspect that integrity standards have been violated, you should discuss this with your (next higher) manager, study programme manager, team leader or responsible director (director of the relevant institute, research centre or department). In the event of a suspected breach of integrity, you can also contact them to make a report.

f) **External Committee on Integrity Violations, Undesirable Behaviour or Misconduct**

Students and employees can report a suspicion of misconduct, an integrity violation or inappropriate conduct to the external Committee on the basis of the Regulations for Reporting Suspected Misconduct, the Regulations for Reporting Suspected Integrity Violations or the Regulations for Inappropriate Conduct.

As an employee or student you can file a complaint via the confidential advisor or directly with the secretary of the external Committee. Students can also file a complaint via the HU Legal Protection Office. The External Committee is independent and impartial.

g) **Scientific Integrity Committee**

If you suspect that scientific integrity has been violated, you can, as an employee of the HU, report this to the Scientific Integrity Committee. This committee assesses the admissibility of the report and then decides whether or not to initiate an investigation. The committee is independent and impartial.

h) **Ombuds Officer**

In the event of complaints or on their own initiative, the Ombuds Officer may investigate whether an (administrative) body or employee of HU University of Applied Sciences Utrecht has behaved properly in a particular matter, and they also investigate whether a complaint can be resolved by advice, referral or recommendations to the parties.

4.3 Sanctions

If you, as an employee of the HU, violate the rules regarding integrity, this may lead to a sanction. Before a sanction is imposed, an investigation is always carried out to determine whether the suspicion concerns an actual violation of integrity. Prior to or during this investigation, a (temporary) disciplinary measure may be taken to restrict actions.

If you, as a student, violate the rules regarding integrity, measures can also be taken, ranging from a warning to permanent expulsion.

**IMPACT
YOUR
FUTURE**