

Procedure Ombudsman Sanquin

Sanquin follows the 'Netherlands Code of Conduct for Research Integrity of 2018', which describes the norms for scientific research, published by the Royal Netherlands Academy of Arts and Sciences (KNAW), the Association of Universities in The Netherlands (VSNU), The Netherlands Organization for Scientific Research (NWO), the TO2-Federation, the Netherlands Association of Universities of Applied Sciences, and the Netherlands Federation of University Medical Centers (NFU). This Code of Conduct can be found at: doi.org/10.17026/dans-2cj-nvwu. It is acknowledged that incidentally research activities of Sanquin are not viewed as publicly available science and therefore the results of such research activities are not always reported in publicly accessible literature.

As Sanquin Research is a small institute, installing an independent internal Scientific Integrity Committee as dictated by the Code of Conduct is not feasible. Therefore we assigned the tasks of this Committee to an external ombudsman, prof Sjaak Neefjes affiliated with the LUMC in Leiden. The external ombudsman can be reached by email: J.J.C.Neefjes@lumc.nl.

Scientific integrity

Sanquin employees will refrain from all forms of violation of scientific integrity as described in the above mentioned Code of Conduct. All Sanquin employees involved in scientific research bear responsibility for ensuring research is conducted in accordance with applicable rules and preventing irregularities. Researchers are personally responsible for the careful and precise performance of their research, in accordance with applicable SOPs and guidelines. This applies to literature research, setting up and performing experiments or observations as well as reporting. Researcher responsibility also extends to the activities of supporting technical and administrative staff. It is important to strive for completeness in reporting. This means the relevant results are described and justifications are noted for those left out.

Research Ombudsman

1 The ombudsman is appointed by the Executive Board.

2 Sanquin is a small research institute compared to universities and university medical centers, and the regulation below regarding the ombudsman is therefore different from similar regulations based on the Netherlands Code of Conduct and the National model complaints procedure (VSNU, 2019).

The position of the ombudsman

1 The ombudsman is independent. The ombudsman is free to work as he/she sees fit, following the 'procedure to follow when making a report' as a guideline. The ombudsman refrains from commenting on areas for which specific legally outlined complaints procedures are in place (for example the procedure with the Personal Data Protection Board in the event of violation of privacy, and issues that fall under the purview of a Medical Ethics Review Committee).

2 The ombudsman's task is to investigate reports of (supposed) scientific misconduct by one or more persons directly or indirectly involved in scientific research within the Sanquin organization.

3 The ombudsman's ruling has no legal standing, unless the Executive Board decides to institute legal proceedings based on a ruling of severe scientific misconduct.

The report

1 Anonymous reports will not be taken under consideration.

2 A report may only relate to a Sanquin employee involved in scientific research or an individual who has signed the declaration to adhere to the Netherlands Code of Conduct for Research Integrity of 2018

3 Reports may relate to incidents or actions that took place no more than 5 years earlier.

4 Maximum care is observed by the ombudsman with regard to both the reporting party and the individual the report pertains to.

Procedure to follow when filing a report

1 Reports should be filed with the ombudsman in writing, or recorded in writing jointly by the reporting party and ombudsman. The ombudsman may be contacted via: e-mail:

J.J.C.Neefjes@lumc.nl

2 The ombudsman allows the reporting party to comment on his report orally.

3 The ombudsman himself decides whether the report warrants further investigation. If the ombudsman decides not to follow up on the report, he/she will inform the reporting party. These reports are registered for the ombudsman's annual report.

4 The ombudsman will hear all parties involved.

5 The ombudsman may, depending on the nature of the report, the parties involved, and the circumstances involved:

- Focus the investigation on ruling on whether scientific misconduct has occurred, with respect to researchers who signed the declaration to adhere to the code of conduct;
- Focus the investigation on finding a solution that is acceptable to the parties involved and suitable within the context of this Guideline; the reports are registered for the annual ombudsman report

6 Except in simple cases, the ombudsman will receive support from one or two advisors with expertise in the area in question.

7 If the ombudsman is personally involved in the incident in any way, the ombudsman will refer the case to the Executive Board.

8 Every Sanquin employee and any party who has signed a declaration to adhere to the code of conduct is required to cooperate with any investigations conducted by the ombudsman as soon as the request is made.

9 The reporting party, the individual the report relates to, and the individual supporting the activities of the ombudsman in any way are required to maintain confidentiality on the matter as well as on the ombudsman's findings, unless the Executive Board releases them of this responsibility.

10 If the investigation initiated by the ombudsman is focused on providing a ruling and leads to the conclusion that there was no scientific misconduct, the ombudsman informs the reporting party as well as, if relevant, the party the report applies to; these reports are registered for the annual ombudsman report.

11 If the investigation initiated by the ombudsman is focused on providing a ruling and leads to the conclusion that there was scientific misconduct, the ombudsman informs the reporting party as well as the party the report applies to.

12 If the investigation initiated by the ombudsman is focused on providing a ruling and leads to the conclusion that there was severe scientific misconduct, the ombudsman also informs the Executive Board; the ombudsman can include recommendations on actions to be taken in his report to the Executive Board.

13 The ombudsman informs the Executive Board if he/she feels a conscious attempt was made to abuse the option to file a report.

Justification

1 The ombudsman files a confidential report with the Executive Board annually for discussion. In this report, the ombudsman provides insight into the number and nature of reports and actions taken in an anonymized fashion. The Executive Board will forward this report to the Works Council for confidential review.

Ruling by the Executive Board / Netherlands Board on Research Integrity

1 Having reviewed the ombudsman's advice, the Executive Board will rule on whether it is also of the opinion serious scientific misconduct has occurred and on the measures that will be taken within a reasonable term.

2 The Executive Board will inform stakeholders of its ruling and point out the possibility for requesting an opinion (on the contents of the ruling or the followed procedure) from the Netherlands Board on Research Integrity (LOWI), as outlined in the regulations of the Netherlands Board on Research Integrity 2022, see [lowi.nl](https://www.lowi.nl).

3 The Executive Board may, before issuing a final ruling, also consult with the LOWI regarding its planned ruling.

4 The Executive Board will issue a final ruling within a reasonable term after receiving the recommendation from the LOWI. The Executive Board will inform all involved parties and the LOWI of this ruling.