

## CODE OF CONDUCT

TIAS School for Business and Society

October 1, 2025

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## Preface

At TIAS, we treat one another with respect—this applies to employees, colleagues, and guests alike, and extends across both our physical campus and the digital environments in which we interact. **Integrity** and **social safety** are essential foundations for conducting research, delivering education, and fostering personal development and growth. We are committed to building a community where everyone feels safe and empowered to reach their full potential.

A safe environment cannot always be taken for granted. That is why it is essential to clearly define the principles of integrity and respectful behavior. These principles are outlined in this **Code of Conduct**.

Our behavior is guided by the four core TIAS values: **Collaborative**, **Listening**, **Agile**, and **Performance-driven**. These values are further developed through seven key themes, each offering direction and clarity on how we are expected to act. The Code of Conduct also references various policies for specific situations and identifies the professionals who can offer guidance and support to participants, employees, and guests facing challenges.

We all share responsibility for upholding the Code of Conduct and contributing to a safe learning and working environment. The Code also provides practical tools to help us address situations where that safety may be at risk.

We strongly encourage everyone—including ourselves—to take responsibility for creating and maintaining a respectful, safe, and open atmosphere in our daily interactions. Every member of our community plays an important role in shaping our shared culture, both on campus and online. We invite everyone to stay engaged in open dialogue and to support one another in fostering a positive environment.

*Together, we are the TIAS community.*

Tilburg, October 1, 2025

**Jenke ter Horst**  
**Dean & Director TIAS**

## Reading Guide and Scope of Application

### Purpose of the Code of Conduct

Everyone is responsible for acting with integrity. Together we (as organization, employees, participants and guests) are responsible for the integrity of TIAS. The rules in this Code of Conduct are meant to guarantee integrity within the organization. They help you with your choices in behavior and dealings. It is important that a culture exists within TIAS in which we help each other and call each other to account for adhering to standards and values for integrity.

### Seven themes about good behavior and manners

The TIAS Code of Conduct uses the following seven themes when working out how employees, participants and guests should act. Each theme has a number of ground rules and explains possible dilemmas.

1. Forms of conduct
2. Independence
3. Use of company resources
4. Dealing with information
5. Good research practices
6. Good teaching practices
7. Accountability and openness

### Scope of application

This Code of Conduct applies to all employees, participants and guests of TIAS and to situations related to work or study and/or activities taking place at TIAS in Tilburg and Utrecht. Under each topic is indicated for whom this topic is specifically relevant:

- **Staff:** Person who is (or has been) employed by TIAS under an employment contract.
- **Participant:** Person registered and affiliated with the degree programs or enrolled in the non-degree programs; including prospective or former participants.
- **Guest:** Person registered as a user of a TIAS facility, other than a participant or employee. For example, someone performing work as self-employed without staff, temporary employee or otherwise working under the responsibility of TIAS, in the role of lecturer or someone from a hired organization.

## Relationship to further and/or special regulations and guidelines

The themes sometimes refer to elaborations of further and/or special regulations and guidelines. These regulations and guidelines are periodically evaluated and adjusted. The Code of Conduct forms the framework and sets out the general principles and rules of play. In the event of any discrepancy between the Dutch text and any translation thereof, the Dutch text will always prevail..

## Responsibility TIAS

The Code of Conduct was drafted in a collaboration between HRM and Education Office. The adoption of this Code of Conduct is within the responsibility of the Executive Management Team (EMT) of TIAS.

As an organization, we aim and facilitate that there is a healthy and safe working or study environment, in which:

- Clear, unambiguous and realistic agreements are made,
- Things can be discussed,
- Mistakes are allowed,
- Staff, participants and guests address each other about undesirable behavior and undesirable manners

TIAS places great importance on integrity and has designated roles and staff members within the organization to support and assist employees, participants, and guests. These include, for example, the Confidential Counsellors, the Complaints Desk, the Whistleblower Coordinator, the Privacy Coordinator, the Examination Board, and the Examinations Appeals Board.

TIAS also collaborates with Tilburg University (TiU) on matters related to scientific integrity and works with an external agency when reports cannot be adequately resolved within the organization.

## Core Values

Everyone is responsible for acting with integrity. Together we (as organization, staff, participants and guests) are responsible for the integrity of TIAS. The rules in this Code of Conduct are meant to guarantee integrity within the organization. They help you with your choices in behavior and dealings. It is important that a culture exists within TIAS in which we help each other and address each other.

***The core values give direction to how we work together, day in and day out.***

The core values define our behavior as colleagues: how we cooperate, communicate, adapt and take responsibility for our work and decisions. Our company values shape the culture within the organization and are the foundation for a healthy, safe and effective work environment.

Think of them as the rules for "how we behave when no one is looking" - our internal code of conduct.

At TIAS, we have four company values where behavior is concerned: Collaborative, Listening, Agile and Performance-driven.



## Roadmaps

To support staff, participants, and guests in navigating the reporting procedures, a roadmap has been developed. This roadmap is designed to guide individuals in addressing concerns with one another directly and, if that proves unsuccessful, in initiating the appropriate reporting procedure.

Link to the roadmaps:

- [Roadmap TIAS employees](#)
- [Roadmap TIAS participants](#)
- [Roadmap TIAS guests](#)

## Theme 1: Conduct and ways of behaving

Our 6 rules for manners of conduct:

### **1. Respect**

You treat each other respectfully, both inside and outside the organization, in word, gesture and writing. You enter into dialogue with others and listen to each other.

### **2. Openness and vulnerability**

You work in collaboration with others. This means you can ask for help, offer support, and approach others with openness and vulnerability. You value and encourage those around you. Meaningful dialogue is essential—built on a foundation of trust, openness, and transparency.

### **3. No discrimination**

You do not engage in discrimination. At TIAS, discrimination is defined as treating a person differently in a comparable situation based on religion, belief, political affiliation, appearance, gender, nationality, sexual orientation, marital status, age, disability, health, or any other ground as stated in Article 1 of the Dutch Constitution.

### **4. No (sexual) intimidation**

You do not engage in harassment. At TIAS, (sexual) harassment is defined as any form of verbal, non-verbal, or physical behavior (with a sexual connotation) that is intended to, or has the effect of, undermining a person's dignity—particularly when it creates a threatening, hostile, offensive, or hurtful environment.

### **5. No aggression or violence**

You do not use aggression or violence against third parties. By aggression and violence TIAS means: all incidents in which a person is psychologically or physically harassed, threatened or assaulted.

### **6. No bullying**

You don't bully. By bullying TIAS means: all forms of intimidating behavior of a structural nature, by one or more persons directed against one person or a group of persons, who cannot or do not defend themselves against the behavior. Examples of bullying include social isolation, ridicule, making work unpleasant or difficult, gossiping, physical violence.

### **Why do we think this theme is important?**

At TIAS, we value openness, mutual support, and collaboration. Academic freedom is a core principle within our organization, but it does not justify undesirable behavior or disrespectful treatment of others. Every individual deserves respect. Valuing one another and allowing space for each person fosters a safe and supportive working and learning environment. Respectful interaction is the foundation of effective cooperation.

As an employee, participant, or guest of TIAS, you are expected not to engage in undesirable behavior toward others. Undesirable behavior is defined as:

(In)direct statements or actions—verbal, non-verbal, or physical—directed at a person and experienced by that person as unwelcome and involuntary, resulting in a violation of their integrity to such an extent that it causes psychosocial strain.

## **Confidential counsellors (undesirable behavior)**

Discuss (suspicions of) undesirable behavior first with the person concerned, then ask your supervisor for advice and then contact HR. In addition, you can also turn to the independent Confidential Advisors. These Confidential Advisors have been appointed by TIAS and are an accessible, confidential point of contact for information, advice or guidance.

## **Suspicion of domestic violence or abuse**

It is possible that you suspect domestic violence or (child) abuse. Discuss this with the person in question, or contact a confidential advisor. In some cases we must report to Safe House (Veilig Huis) as part of the Reporting Code for domestic violence and child abuse. This assessment is made by the Confidential Advisor. You can find more information on the website of Safe Home and the Reporting Code for domestic violence and child abuse.

## **Further elaborations and guidelines**

- [Internal Policy on unacceptable behaviour and misconduct](#)
- [Social media Guidelines](#)
- [Hotline domestic violence and \(child\) abuse](#)

## **Applicable to:**

- Staff
- Participants
- Guest

## Theme 2: Independance

Our 6 rules for independance:

### 1. Conflicts of Interest

- You must avoid actual or perceived conflicts of interest situations in which your personal or external business interests conflict, or appear to conflict, with the proper performance of your duties and responsibilities at TIAS.
- You may not use your knowledge, position, or influence to further your own interests or those of another person or organization with whom you have a personal connection.
- There must be no actual or potential (financial) benefit for yourself, your colleagues, your partner, family members, or friends resulting from your role at TIAS.

### 2. Ancillary works

You ask your supervisor for written permission to perform paid or unpaid jobs outside your own work.

### 3. Design and content of research

You do not allow yourself to be influenced by the interests of others in the design or content of your research. This means you do not permit third parties to exert undue influence over the research process, including its design, content, phrasing, or the publication of results. If you have any reasonable doubts about such influence, you are expected to discuss the matter with your supervisor, lecturer, or academic advisor.

*Refer also to Theme 5: Good Research Practices for further guidance.*

### 4. Gifts and donations

Employees should exercise restraint and transparency when accepting a business gift or invitation from a TIAS business associate. This is to avoid a situation where accepting a business gift or invitation may influence decisions.

Occasionally, employees may accept an everyday gift such as a bottle of wine, a diary or flowers. These business gifts should be addressed exclusively to the business address. It is recommended that these gifts be (re)shared with colleagues.

Presentations with a value greater than €50 can only be accepted with the approval of the manager. Cash, which includes vouchers, cannot be accepted as a business gift. Invitations to trips and events and possibly having the invitee accompanied by a partner requires approval from the Executive Management Team.

### 5. Invitation for not work-related events

You accept business invitations to lunches, dinners, receptions and other events paid for by others only if your presence is functional or representative and the appearance of a conflict of interest is minimal. You consult with your supervisor in advance in

case of possible doubt, for example when you are in a consultation, assessment or negotiation situation with the organizer/host.

## **6. Discuss your private relationships**

You are expected to disclose any personal relationships with colleagues or participants to your supervisor or Academic Director. It is your responsibility to take appropriate measures to prevent any potential undesirable effects resulting from such relationships. This also applies to situations where a colleague is in a relationship with a participant, or where a supervisor is in a relationship with a PhD student.

If you are a participant and have a personal relationship with another participant whom you are required to formally assess, you must discuss this with your supervisor in advance.

### **Why do we think this topic is important?**

Academic freedom and (scientific) integrity require constant attention to the principle of independence. A conflict of interest can harm the reputation of the academic profession. Even the perception of compromised independence can undermine public trust in scientific research and leave you personally vulnerable.

The same standard applies when you are involved in the procurement of products or services. TIAS aims to prevent any unnecessary mixing of private interests with your responsibilities as an employee, participant, or guest.

It is essential to approach this matter with care to avoid future disputes or doubts regarding your independence or potential (financial) conflicts of interest.

If you have any doubts about an actual or perceived conflict of interest, it is important to raise and discuss this with your supervisor, immediate colleagues, lecturer, or tutor.

### **Consultation with your supervisor or Academic Director**

In the following situations, always consult with your supervisor:

- The acceptance of paid or unpaid ancillary activities, unless the exception applies as mentioned above. This applies to all TIAS employees and also to non-salaried professors appointed by the Executive Management Team.
- If there is a (potential) appearance of a conflict of interest.
- If you doubt the influence of others on the design, content and outcomes of your research.
- When receiving gifts that do not comply with the guidelines on receiving business gifts and invitations to non-work related activities. Your supervisor determines what to do with the gift or invitation.

- When there is a private relationship between employees or between a participant and the professor/lecturer who supervises and/or evaluates him/her.

## **Further elaborations and guidelines**

- Regulation on Ancillary Activities
- Working conditions documents TIAS

## **Applicable to:**

- Staff
- Participant (rules 3 and 6)
- Guest (rules 3 and 6)

## Thema 3: Use of company resources

Our 4 rules for the use of company resources.

### 1. Diligence

In using the buildings, grounds and facilities of TIAS, you behave in such a way that

- You do not cause any direct or indirect damage or nuisance to TIAS and/or third parties;
- You do not violate any right of TIAS or third parties;
- You will not act in violation of statutory or TIAS regulations. This also includes what is considered socially acceptable according to unwritten law.

### 2. Limited private use

- You will not use company resources for any purpose other than for performing your work or study.
- You will only use rooms for work/study or activities on behalf of TIAS.
- You may make limited private use of a laptop or phone provided by TIAS, as long as this does not interfere with your own work or the work of others and does not offend others.
- The use of company resources is personal; you may not provide or lend them to others.

### 3. Legal and ethical use

You may not download illegal software. Nor may you use company resources to view, download or distribute pornographic, racist, discriminatory, insulting, offensive or (sexually) intimidating texts and images. The same applies to sending messages that may incite hatred and/or violence.

### 4. Expenses

You only incur expenses that are reasonable and necessary for the proper performance of your job (lawful and efficient). Furthermore, expense claims must comply with the guidelines for expense claims:

- You need to have permission from your superior before you can claim expenses.
- You follow the guidelines from the Finance & Control Manual

### **Why do we think this theme is important?**

TIAS strives to spend as many resources as possible on education and research. In order to allow colleagues, fellow participants and guests to use company resources as well, they should be handled carefully, efficiently, lawfully and transparently. It is therefore not the intention to damage or lend out company resources.

### **Nadere uitwerkingen en richtlijnen**

- House rules Library Tilburg University
- Code of conduct company resources
- Manual Finance & Control

### **Applicable to:**

- Staff
- Participants (rules 1 and 2)
- Guests (rules 1 and 2)

## Theme 4: Dealing with information

Our 5 rules for the use of information:

### 1. Functional use

You may only use information obtained through your role or studies for the purpose of fulfilling your responsibilities, and always within the boundaries of the law. In other words, you must not misuse or exploit such information—whether for your own benefit or that of others.

### 2. Secrecy

You are required to keep confidential information strictly private. You must never share, distribute, or disclose information that is classified as confidential or that you have reason to believe should be treated as such.

### 3. Privacy

You respect everyone's privacy. You act in line with the Social Media Guidelines and the Privacy Policy. If you want to take photos or (video) recordings of a person or college and/or share information about someone or a presentation, you must ask permission from those involved.

### 4. Intellectual Property

You respect the intellectual property of others. If you want to use something, ask permission and/or cite the source. Intellectual property is a collective term for a number of rights, such as copyright or portrait rights. You may not just use texts or photos of others. They may be protected under these rights and you must have permission to use them. This also applies to images you find on the Internet.

### 5. Proper security

You take the right measurements (within and outside your working hours) to secure information. This means:

- clean desk;
- clear screen;

Never leave documents and data carriers (such as laptop, phone or USB stick) unattended. In addition, make sure that computers are properly secured, with the latest updates of operating software, virus scanner and/or encryption. This also applies to a private computer or phone you use for TIAS. Because we find it very important that our employees handle information carefully, all employees are required to follow the Digital Safe Working training.

**Why do we think this is important?**

TIAS has a lot of information, much of which is confidential. On the one hand, as an organization we want to be as transparent as possible, but there are situations where confidentiality is necessary. There are therefore all kinds of rules regarding protection of personal data and copyright and portrait rights. Careless handling of this (confidential) information damages the reputation of TIAS, the user and/or the owner of the information. There may also be a violation of laws or regulations, such as the General Data Protection Regulation.

**Nadere uitwerkingen en richtlijnen**

- Information Security
- Copyright information Point (TiU)
- Privacy Policy & general data Protection Regulation
- Social media guidelines

**Applicable to:**

- Staff
- Participants (rules 1, 3 and 4)
- Guest (rules 1, 3 en 4)

## Theme 5: Good research practices

Our 11 rules for good research practices, based on the Dutch Code of Conduct Scientific Integrity:

### 1. Principles scientific integrity

You conduct scientific research in line with the principles of honesty, diligence, transparency, independence and responsibility according to Chapter 2 of the Dutch Code of Conduct for Scientific Integrity.

### 2. Standards for good research practices

You meet the standards for good research practices that apply during the various phases of research (design, execution, reporting, assessment and peer review, communication), according to sections 3.2 to 3.7 of the Dutch Code of Conduct for Scientific Integrity.

### 3. Open and inclusive culture

As a supervisor, project manager, research director, supervisor or administrator, ensure an open, inclusive and opportunity-oriented culture for the researcher in all phases of research.

### 4. Encourage Compliance with the Code of Conduct

As a supervisor, project leader, research director, supervisor or director, you encourage the researcher to comply with the standards of good research practice. You refrain from any action that encourages the researcher to fail to comply with one or more standards of good research practice.

### 5. No delay or impediment

You do not improperly delay or impede the work of other researchers.

### 6. Supervision

As supervisor(s) or project leader, you will ensure that the researcher you supervise meets quality and integrity requirements and that procedures are followed by the researcher.

### 7. Discuss/report

You will raise non-compliance with standards of good research practice by other researchers or inadequate responses to them by TIAS if there is sufficient cause. This can be done with your supervisor, Academic Director, or (vice) dean. You can also, in extreme cases, file a complaint with Tilburg University's Committee on Scientific Integrity ([cwi@tilburguniversity.edu](mailto:cwi@tilburguniversity.edu)).

## **8. Lawful and efficient use of research funds.**

You do not misuse public and/or private research funds made available.

## **9. Academic freedom**

In scientific research, you ensure that no restrictions are imposed by third parties that violate academic freedom. In addition, you conduct your research independently and you avoid (the appearance of) conflicts of interest.

## **10. Open Science**

In scientific research, you make the research data and the research data during and after the research as much as possible publicly available ("open science"). Research output (articles, books) are made available "open access" as much as possible through the routes that see available for this purpose. See Tilburg University's Open Science Framework for this purpose.

## **11. Statement scientific integrity**

Academic staff and professors without an employment contract with TIAS confirm their commitment to responsible research and that they will do everything possible to promote compliance with the Code of Conduct in their academic environment.

## **Why do we think this theme is important?**

TIAS endorses the Dutch Code of Scientific Integrity (2018) and expects you to comply with this code and to do everything possible to promote compliance in your academic environment. TIAS is committed to protecting and safeguarding scientific integrity and aims to:

- prevent misconduct and violations;
- raise awareness and create a culture of openness and transparency;
- provide a transparent process in assessing cases where scientific integrity may be compromised.

Honesty, diligence, transparency, independence and accountability are the guiding principles of good research. Failure to perceive these principles as guiding threatens both the quality and reliability of scientific research and that of the individual scientist and the university as an institution. This can lead to direct damage, for example to the environment or test subjects, but can also damage society's trust or the trust between scientists.

Developments around Artificial Intelligence (AI) have a major impact on current research practices. When using Generative AI in research and business, take the [“TIAS Basic Rules on AI 2025”](#).

## **Transparency and consideration in ethical dilemmas**

In research, you will face ethical dilemmas. Always be open about this! And make careful considerations that can be justified. If you have an ethical dilemma concerning your research, consult with your supervisor or colleagues. Research proposals involving the participation of subjects and/or personal data are reviewed within the faculties for ethical, AVG and data management aspects by the ethical review committee.

## **Nadere uitwerkingen en richtlijnen**

- [Dutch Code of Conduct Scientific Integrity](#)
- [Code of conduct for Scientific Integrity](#)
- [Ethical Review Board](#)

## **Applicable to:**

- Staff
- Participants
- Guests

## Theme 6: Good Teaching Practices

Our 7 rules for good practices with the teaching and learning environment.

### 1. Good teaching practices

As an instructor, you meet the standards for quality teaching during the various phases of teaching and testing. As Academic Director, Head Professor or Manager Education Office and Faculty Office, you ensure that teaching, including assessment, meets the standards for good (quality) teaching. You refrain from any action that encourages non-compliance with these standards. You raise non-compliance by others with these standards of good education. This can be done with the examination board, your supervisor, (vice) dean or confidential counsellor.

### 2. Open and inclusive culture

As a teacher, you provide an open, inclusive and opportunity-oriented culture for the participant. As a participant, you also contribute to the desired culture through your own attitude and behavior.

### 3. Behavior at exams (oral and written)

As a participant, you write yourself and do not give others the opportunity to copy or duplicate your work. For oral exams, you are generally physically present, and if it is online, you provide a working camera.

### 4. Aids during exams

Participants do not use aids during examinations, unless otherwise indicated by the Examination Board in the rules for written examinations or in the reader accompanying the examination, or for participants with a facility in the decision granting examination facilities.

### 5. Possession of examination questions and/or elaborations.

A participant may not possess examination papers or elaborations of the examination to be taken prior to the date and time of that examination.

### 6. Attendance sheets

Participants always sign the attendance sheet themselves.

### 7. Plagiarism (papers and theses)

Participants are expected to produce their own assignments, papers, and theses. You may not have these works created by others—whether commercial services, individuals, or AI systems—and present them as your own.

When writing your thesis or any other paper, you must properly cite your sources when incorporating text, reasoning, or ideas from others. This includes the correct use of quotations and paraphrasing, in accordance with academic standards.

## **Why do we think this theme is important?**

The quality of education and the creation of a safe, inclusive, and welcoming learning environment—where everyone feels seen, heard, and valued—are central to everything we do at TIAS. These are core principles that guide our actions and define what we expect from one another. Integrity in the behavior of both faculty and participants is essential to fostering an honest and respectful academic environment.

Integrity in education also underpins the trust in the value of a diploma. This means that fraud and plagiarism are unacceptable under any circumstances. To prevent such violations, detailed rules have been established in the Rules and Guidelines of the Examination Board and the Education and Examination Regulations (EER). These aspects of academic integrity are further explained in the sections below.

Recent developments in Artificial Intelligence (AI) have a significant impact on educational practices. When using Generative AI in educational contexts, you are expected to follow the TIAS Basic Rules for AI.

## **Further elaborations and guidelines**

- [Education and Examination Regulation](#)
- [Rules and Guidelines Examination Board](#)
- [Examination Appeals Board](#)
- [TIAS Basic Rules on AI](#)

## **Applicable to:**

- Employees, Teaching Staff, lectures and assistants
- Participants
- Guest

## Theme 7: Responsibility and openness

Our 4 rules for responsibility and openness :

### 1. Responsibility

You are responsible for your own integrity and compliance with this Code of Conduct.

### 2. Discussability

If you suspect that a staff member, participant, or guest is violating this Code of Conduct, you are expected to report it. Please refer to the roadmaps for guidance on who to contact in such cases.

### 3. Dilemma's

You are encouraged to disclose any questions, concerns, doubts, or suspected violations of the Code of Conduct. If you are unsure whether a particular action constitutes a violation, consult your supervisor, HR representative, Academic Director, or the Confidential Councillor. Alternatively, you may report the matter to the Complaints Desk.

### 4. Duty report violations by managers

For (suspicions of) a number of specific integrity violations, there is a duty for managers/Academic Director to report. This duty to report applies to (suspicions of):

- Undesirable manners
- Conflicts of interest
- Manipulation or misuse of information
- Abuse of authority or position
- Incompatible functions/activities
- Offenses such as theft, embezzlement, larceny or corruption
- Misuse of TIAS property

Managers/Academic Directors always report suspected integrity violations to the Executive Management Team or HR. For the reporting procedure, please read the steps and timeline in the Appendix 2 for reporting misconduct.

**Why do we think this theme is important?**

Everyone shares responsibility for acting with integrity. Since we are collectively accountable for upholding the integrity of TIAS, it is essential to foster a culture where open dialogue is encouraged. We support one another and accept being held accountable for adhering to integrity standards—because doing so is an integral part of professional behavior.

***TIAS encourages discussing and reporting integrity issues!***

### **Openness and vulnerability show strength and are appreciated**

It is quite complex in the practice of temptations, risks, moral issues and dilemmas to always act with integrity. That is why it is nice and also necessary to be able to talk about this with each other. Be open, discuss with fellow participants, colleagues and guests how best to act in difficult situations and ask for help if you can't work it out yourself.

Openness and vulnerability show strength. It ensures that we learn from each other. You are responsible for discussing questions, difficulties, doubts and violations of these rules. But you are also responsible for ensuring that others can come to you with their dilemmas or questions.

### **Hotline**

The following section lists different people and agencies you can contact if you want to discuss a problem or dilemma with someone other than your immediate colleagues, fellow participants or supervisors. If you don't know exactly who to turn to, you can always contact HR, the confidential advisor or Education Office. There is more information about this in the next chapter as well.

**You can also consult the road maps for more information on who and where to turn to.**

***The most important thing is that you do not stay silent! Together you can often find good solutions.***

## **Appendix 1 Experts and Hotlines**

### **Confidential counsellors**

The confidential counsellors are available to everyone at TIAS. They serve as the point of contact for employees, participants, and guests who are confronted with undesirable behavior, such as (sexual) harassment, bullying, aggression, violence, or discrimination. They are available to listen, provide information, offer guidance, and advise on possible steps to address and end such behavior.

Carefulness and confidentiality are key words in the working method of the confidential counsellor. The confidential advisor is therefore obliged to treat all information confidentially. A reporter must always give explicit permission before the confidential advisor can obtain information from other persons or institutions. Control always lies with the employee, participant or guest; the confidential counsellor guides and advises.

The confidential counsellor does not replace existing procedures. If a problem is reported to the confidential counsellor, he or she will first check with the reporter whether the matter is not already being dealt with by responsible bodies or officials, or whether it can be filed there. If that is the case, the confidential counsellor will exercise restraint. The confidential counsellor can also make a referral. Naturally, this is always discussed with the notifier.

### **What is the role of a confidential counsellor**

The confidential counsellor addresses integrity violations, misconduct, and undesirable behavior. This role encompasses three core responsibilities:

- a) Support and Reception: Providing support as the first point of contact for employees, students, or participants who are experiencing undesirable behavior or suspect an integrity violation.
- b) Education: Raising awareness by providing information about the integrity policy and the role of the confidential counsellor within the organization, targeting employees, management, and the board.
- c) Advisory: Advising the board and management on matters related to integrity and undesirable behavior.

### **What is not the task of a confidential counsellor?**

Issues related to performance and assessment reviews, reorganizations, labor conflicts, personal matters, or mediation do not fall within the scope of the confidential counsellors—unless the behavior resulting from these situations qualifies as undesirable behavior, as defined in the reporting procedure.

## **Confidentiality**

The information held by the confidential counsellor is treated as confidential, unless there are legal obligations that override the duty of confidentiality. In such cases, the confidential counsellor must inform the reporter of this exception.

The confidential counsellor is bound to maintain confidentiality regarding any information received that concerns the privacy of those involved. This obligation may only be waived with the explicit consent of the individuals concerned. The duty of confidentiality remains in effect even after the counsellor is no longer serving in that role.

## **Confidential Counsellors (2025)**

- Roger Bougie (internal)  
Tel: +31134668691  
E-mail: [j.r.g.bougie@tias.edu](mailto:j.r.g.bougie@tias.edu)
- Mirjam Minderman (external)  
Tel: +31613521273  
E-mail: [m\\_de\\_niet@hotmail.com](mailto:m_de_niet@hotmail.com)

## **Program Managers**

Every participant can make use of the support of a Program Manager (PM). TIAS has PMs who assist participants with any study-related issues. While the PM does not resolve the problem directly, they can offer advice, mediate, and/or refer the participant to the appropriate resources. The PM also advises the Examination Board if a participant wishes to deviate from the rules due to exceptional circumstances.

## **Integrity Coordinator (HRM)**

The Integrity Coordinator is responsible for coordinating and implementing the integrity policy. The tasks of the Integrity Coordinator include:

- Monitoring the implementation of the integrity policy and the Code of Conduct.
- Serving as a central point of information and ensuring the coherence and completeness of regulations, investigations, and enforcement.
- Acting as an independent internal investigator, when assigned by the Executive Management Team (EMT), to handle reports of individual cases involving integrity violations.
- Reporting directly to the EMT.

## Complaints Desk

At the Complaints Desk, participants, employees (including supervisors), and guests can seek advice and confidentially report concerns or file complaints related to social safety and other (alleged) integrity violations. The Complaints Desk acts as a central point of contact and referral, directing reports, signals, or complaints to the appropriate professional, department, or committee for proper handling. The Education Office serves as the administrator of the inbox.

When discussing integrity violations, the terms *reports*, *signals*, and *complaints* are often used interchangeably. However, TIAS makes a clear distinction between these terms, including in how they are handled.

The Complaints Desk registers all incoming reports, signals, and complaints, thereby contributing to an (anonymous) overview of these issues. This registration complies fully with all privacy protection requirements. The contact email is: [complaintsdesk@tias.edu](mailto:complaintsdesk@tias.edu)

## Prevention Officer

The Prevention Officer plays a crucial role in ensuring a safe and healthy working environment. The key responsibilities of the Prevention Officer include:

- Assisting in the preparation and implementation of the Risk Inventory and Evaluation (RI&E).
- Advising and closely collaborating with the Works Council or employee representatives on the measures to be taken to ensure effective occupational health and safety policies.

- Participating in the implementation of these measures.
- Providing advice to and working in cooperation with the company doctor and other occupational health service providers

### **External Complaints Organization**

The External Complaints Committee is an independent body that employees can contact in the event of a complaint related to undesirable behavior, integrity, or social conduct. The members of the External Complaints Committee have extensive experience as confidential counsellors and complaint handlers. The committee can be reached at [info@deexterneklachtencommissie.nl](mailto:info@deexterneklachtencommissie.nl).

### **Complaints desk for misconduct scientific integrity**

This external complaints desk (via the University of Tilburg) is an independent committee that is available to staff, participants and guests, when they see a violation against scientific integrity. The mailadres is [CWI@Tilburguniversity.edu](mailto:CWI@Tilburguniversity.edu).

## Appendix 2 Reporting procedure within TIAS for (suspected) integrity violations

### Integrity Violations

In cases of undesirable behavior and/or incidents related to academic integrity, different procedures apply. These are outlined in the Complaints Procedure for Undesirable Behavior, the Complaints Procedure for Academic Integrity, or in situations covered by the Whistleblower Policy.

Integrity violations include, but are not limited to:

- Undesirable behavior;
- Conflicts of interest;
- Manipulation or misuse of information;
- Abuse of authority or position;
- Incompatible roles/activities;
- Criminal offenses such as theft, embezzlement, fraud, or corruption;
- Misuse of TIAS property.

### Investigation of (suspected) Integrity Violations

If, either as a result of a report or independently, the Executive Management Team (EMT) has a concrete suspicion that the Code of Conduct or a specific behavioral guideline has not been followed, it may instruct the Integrity Coordinator to initiate a dialogue, conduct a (person-focused) investigation, or perform a risk analysis.

### Outline of a (Person-Focused) Fact-Finding Investigation:

The Integrity Coordinator assesses the admissibility of the report and determines the most appropriate approach, depending on the severity, nature, urgency, and scope of the suspicion.

- If the report concerns undesirable behavior or academic integrity, the Integrity Coordinator may refer the matter to the relevant Confidential Counsellor and/or the Complaints Desk.
- If the report involves a situation governed by the Whistleblower Protection Act, the Integrity Coordinator may refer it to the appropriate Confidential Counsellor.

- The Integrity Coordinator is authorized to discuss the report and initial findings confidentially with the EMT and may request their advice.
- The Integrity Coordinator advises the EMT on how to proceed with the report.

In some cases, a supervisor may handle the report directly, in which case the Integrity Coordinator may advise on the resolution or provide recommendations for improvement.

If the EMT, after receiving advice from the Integrity Coordinator, concludes that the seriousness of the report warrants further investigation, it may authorize the Integrity Coordinator to conduct a (preliminary) fact-finding investigation.

The scope and intensity of the investigation are determined based on an assessment of:

- Proportionality (justified purpose and respect for the privacy of those involved), and
- Subsidiarity (preference for the least invasive and burdensome method).
- The individual(s) involved will be informed—ideally beforehand, but in any case afterward—about a (person-focused) investigation.

For person-focused investigations, a hearing and response procedure (hearing both sides) will always take place before the EMT finalizes the outcome.

## **Cooperation with Investigations**

Everyone involved in procedures under the Code of Conduct is expected to cooperate fully with the investigation of a complaint, the resolution of any potential conflict, and to comply with any specific measures that may follow.

## **Due Care for Accused Persons in Handling Reports or Complaints**

A report, by definition, involves an “accused” (or “alleged perpetrator”). If a report leads to a formal complaint, the individual is considered a “defendant.”

It is essential that the accused or defendant is treated with the utmost care throughout all phases of the process. They are also entitled to appropriate support or guidance, such as from an (external) Confidential Counsellor.

## **Sanctions and measurements**

The Executive Management Team (EMT) is authorized to determine whether, and to what extent, there has been a violation of this Code of Conduct and/or any specific behavioral guideline.

If the Code of Conduct or a specific behavioral guideline has been breached, the EMT will assess whether it is appropriate and desirable to impose a sanction or measurement. Any such measurement or sanction must, of course, be appropriate and proportionate. In cases of serious violations by an employee, the EMT is authorized to impose employment-related sanctions, such as a formal reprimand, reassignment, demotion, or dismissal. In cases of serious violations by a participant or student, the EMT is authorized to terminate the enrolment of the participant or student for a period of one year or permanently. In less severe cases, the EMT may opt for a warning or another suitable measure.

The EMT may also decide to contact external supervisory authorities or bodies empowered to impose administrative, disciplinary, or criminal sanctions.

In the case of (suspected) criminal offenses, TIAS will always report the matter to the police.

## **Nadere uitwerkingen en richtlijnen**

- [Confidential Employees](#)
- [Internal Procedure on unacceptable behaviour and misconduct](#)
- [External Complaints Procedure on undesirable misconduct](#)
- [Roadmap employees](#)
- [Roadmap participants](#)
- [Roadmap guests](#)