

Complaints Procedure for Scientific Integrity

Princess Máxima Center for pediatric oncology BV

Date

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Introduction

The mission of the Princess Máxima Center is to cure every child with cancer with optimal quality of life. To pursue this mission, scientific research is essential. This research must take place in a thorough and transparent manner, for which scientific integrity is of key importance.

All those involved in research at the Princess Máxima Center bear a personal responsibility for maintaining scientific integrity. The general principles of professional scientific conduct must therefore always be followed. The principles are elaborated in the latest version of the Netherlands Code of Conduct for Research Integrity. These are endorsed by the Princess Máxima Center.

One of the manners by which scientific integrity can be assessed is via the right to submit a complaint if (there is a suspicion that) employees of the Princess Máxima Center breach scientific integrity. The Princess Máxima Center considers it vitally important that complaints about scientific conduct are brought forward. This provides the opportunity to find a solution and helps safeguard scientific integrity. This document presents the complaints procedure, adopted by the Princess Máxima Center, including relevant information regarding handling a complaint and the protocol, that will be followed.

Article 1. Definitions

For the purposes of these Complaints Regulations and any provisions made pursuant to them, the following definitions apply:

- a) **Institution:** the Princess Máxima Center for pediatric oncology B.V.;
- b) **Committee:** the Scientific Integrity Committee established by the Executive Board for the handling of complaints concerning alleged breaches of scientific integrity;
- c) **Code of Conduct:** Netherlands Code of Conduct for Research Integrity;
- d) **Complaints Procedure:** the Complaints Procedure for Scientific Integrity;
- e) **Complaint:** a report concerning (a suspicion of) breach of scientific integrity committed by an Employee;
- f) **Complainant:** the person submitting a Complaint to the Committee, whether or not via the Executive Board or the Confidential Counselor;
- g) **Respondent:** the Employee of the Institution whose conduct is the subject of a Complaint;
- h) **Employee:** anyone who has (or has had) an employment contract with the Institution, or who otherwise works (or has worked) under the responsibility of the Institution;
- i) **Confidential Counselor:** the person appointed by the Executive Board as confidential counselor for scientific integrity;
- j) **LOWI:** National Body for Scientific Integrity;
- k) **Chair:** chair of the Scientific Integrity Committee;
- l) **Secretary:** administrative secretary of the Scientific Integrity Committee;
- m) **Group Leader:** leader or former leader of a research group;
- n) **Scientific Advisory Board:** the Scientific Advisory Board of the Princess Máxima Center;
- o) **Supervisory Board:** Supervisory Board of the Princess Máxima Center;
- p) **Executive Board:** Executive Board of the Princess Máxima Center

Article 2. Purpose of the Complaints Procedure

The purpose of this Complaints Procedure is to:

- a) Promote scientific integrity within the Princess Máxima Center and to take responsibility for the conduct of every researcher who conducts or has conducted scientific work within the Institution;
- b) Provide a diligent and fair procedure for handling all Complaints regarding the Scientific Integrity of its researchers;
- c) Do justice to Complainant(s) and Respondent(s);
- d) Provide an opportunity to restore the relationship between Complainant(s), Respondent(s), and the Institution, based on mutual trust and equality.

Article 3. Purpose of the Complaints Procedure

Article 3.1 Manner of submitting Complaints

1. Everyone has the right to submit a complaint to the Committee, whether or not via the Executive Board. Before a Complaint is lodged, the Complainant may seek advice from one of the Confidential Counselor, as referred to in Article 4.1 of the Complaints Procedure.
2. If the Complaint concerns a member of the Executive Board, it may be submitted to the Committee, whether or not via the Supervisory Board. In such cases, the Committee issues advice to the Supervisory Board, which exercises the authorities described in Article 6.
3. A Complainant may submit a Complaint in writing to the Committee.
4. A Complaint submitted to the Executive Board is forwarded without delay to the Secretary of the Committee.
5. The Executive Board may also request the Committee to conduct an investigation into an alleged breach of scientific integrity even without a Complaint has been lodged. In that case, the procedure described in this Complaints Procedure is followed accordingly.
6. An anonymous Complaint will only be considered if the Committee sees reason to do so because:
 - a. overriding public interests or significant interests of the Institution or those involved justify doing so, and
 - b. the fact-finding can take place without the Complainant's contribution.
7. Everyone involved in the handling of a Complaint shall maintain confidentiality with respect to all information that has come to their attention in connection with the Complaint. This duty of confidentiality shall continue to apply after the final decision has been issued.

Article 3.2 Cooperation

Everyone is required to provide the Confidential Adviser and the Committee, within the reasonable period specified, with all cooperation that they may reasonably require in the exercise of their powers.

Article 4. Confidential Counselor

Article 4.1 Duties of the Confidential Counselor

The Confidential Counselor:

- a) Serves as point of contact for questions and complaints about scientific integrity;
- b) Attempts, where he or she considers this feasible, to mediate or otherwise resolve complaints
- c) Guides the Complainant in submitting a Complaint to the Committee;
- d) Assists upon request during the procedure;
- e) Acts only with the consent of the Complainant or Respondent;
- f) Does not act simultaneously for both Complainant and Respondent.

Article 4.2 Appointment of the Confidential Counselor

1. The Executive Board appoints two or more Confidential Counselors for a period of four years (after consultation with the chair of the Scientific Advisory Board). Reappointment for consecutive terms of four years is possible.
2. Requirements for appointment:
 - a. being a senior scientist with a sustainable appointment at the Princess Máxima Center and extensive experience in research and education;
 - b. having an unblemished scientific reputation;
 - c. being able to handle opposing views and conflicts.
3. The Executive Board may terminate the appointment prematurely:
 - a. at the Confidential Counselor's request;
 - b. upon termination of employment;
 - c. for no longer meeting the appointment requirements;
 - d. for inadequate performance as Confidential Counselor (after consultation with the chair of the Scientific Advisory Board).
4. Members of the Supervisory Board, Executive Board, and directors operations, preclinical and clinical research cannot be appointed as Confidential Counselors.

Article 4.3 Accountability and confidentiality

1. The Confidential Counselors shall be accountable to the Executive Board for their activities in retrospect by means of an annual report for inclusion in the Institution's annual report, in which the activities carried out are described in general terms. The report shall not be traceable to any individual.
2. The Confidential Counselors shall maintain confidentiality with respect to all information that comes to their attention in that capacity. Deviation is only possible with explicit permission from Complainant or Respondent.

Article 5. Scientific Integrity Committee

Article 5.1 Duties of the Committee

The Committee has the following duties:

- a) To investigate Complaints and to provide an opinion on the merits of the Complaints taken into consideration by the Committee, and to submit advice to the Executive Board;

- b) To undertake activities to promote awareness of scientific integrity and to prevent breaches thereof. The Committee shall also, whether requested or on its own initiative, advise the Executive Board on the Institution's policy concerning breaches of scientific integrity, based on the Complaints handled by the Committee as well as on the outcome of Complaints received by the Institution that have been resolved through mediation.

Article 5.2 Powers

The Committee shall have the following powers:

- a) To obtain information from all employees and bodies of the Institution. The Committee may request access to all documentation, including the data relating to the research to which the investigation pertains, and any correspondence that it considers relevant to the assessment of the Complaint. Where the Committee considers this necessary, non-public parts of the scientific research and the corresponding research data shall be made available for inspection by two persons appointed by the Committee for that purpose. These persons shall carry out the inspection under strict confidentiality and shall report their findings only to the Committee. The findings shall be presented in the Committee's opinion in such a manner that the confidentiality of the research or the research data is not compromised.
- b) To hear or consult witnesses and experts, whether or not affiliated with the Institution. A record shall be made of any hearing or consultation.
- c) To hear or consult the Complainant and the Respondent. A record shall be made of any hearing or consultation.

Article 5.3 Appointment and composition of the Committee

1. The Executive Board establishes the Committee Scientific Integrity (after consultation with the chair of the Scientific Advisory Board).
2. The Committee consists of a chair and at least two other members. One of the members shall be a legal expert. The Committee shall be supported by a Secretary. In addition, the Committee shall have a Deputy Chair and a Deputy Member.
3. Requirements for appointment of (deputy) chair and (deputy) members, other than the legal expert:
 - a. being a Group Leader with a sustainable connection to the Princess Máxima Center and extensive research and teaching experience;
 - b. having an unblemished scientific reputation;
 - c. being able to handle opposing views and conflicts.
4. The Executive Board shall ensure that, in appointing the members of the Committee, due regard is given to a balanced composition with respect to gender and field of research (preclinical and clinical).
5. The (Deputy) Chair and the (Deputy) Members of the Committee shall be appointed by the Executive Board for a term of four years. Reappointment for successive terms of four years is permitted.
6. The Executive Board may terminate the appointment prematurely:
 - a. at the Committee member's request;
 - b. for no longer meeting the appointment requirements;

- c. for inadequate performance as Committee Member (after consultation with the chair of the Scientific Advisory Board).
7. The members of the Supervisory Board, the members of the Executive Board, the Directors of Operations, Preclinical Research and Clinical Research, and the Confidential Counselor shall not be eligible for appointment as Chair or Member of the Committee.

Article 5.4 Working method

1. To the extent that the Committee's procedures are not laid down in these Complaints Regulations or in the Committee's internal procedures, they shall be determined by the Chair.
2. In the handling of a Complaint, at least the Chair or Deputy Chair and two Members, including the legal expert, shall be involved. The Chair shall determine, for each Complaint, which Members of the Committee will handle the Complaint.
3. Members of the Committee who are in any way involved with the persons or the facts to which the Complaint relates shall not be eligible to handle that Complaint.

Article 5.5 Accountability and confidentiality

1. The Committee shall be accountable to the Executive Board for its activities by means of an annual report in retrospect for inclusion in the Institution's annual report.
2. The Members and the Secretary of the Committee, as well as any experts consulted by the Committee, shall be bound by confidentiality with respect to all information that comes to their knowledge by virtue of their involvement with the Committee. This duty of confidentiality shall continue to apply after the final decision has been issued.
3. The Committee shall ensure the proper archiving and destruction of its records. The Secretary shall be responsible for maintaining the Committee's archive

Article 6. Procedure

Article 6.1 Commencement of the Procedure and Admissibility

1. Upon receipt of the Complaint, the Committee shall, within two weeks, notify the Complainant and the Respondent in writing that it has received the Complaint and shall inform the parties concerned of the procedure it will follow and of the contents of the Complaint.
2. The Committee assesses admissibility of the Complaint based on among others the following criteria--:
 - a. a clear description of the (suspected) breach of scientific integrity by one or more identified Employees of the Institution;
 - b. the relevant written documents or other evidence relating thereto;
 - c. the name, position, and contact details of the Complainant, unless Article 3.1, paragraph 6, applies.
3. If the Complaint does not meet the requirements set out in paragraph two, the Committee may give the Complainant the opportunity to supplement the Complaint within a period determined by the Committee.

4. The Committee shall have the authority to advise the Executive Board not to consider a Complaint if:
 - a. in the Committee's opinion, the alleged breach occurred too long ago or the Complainant has unreasonably delayed submitting the Complaint; in principle, this shall be deemed to be the case if the alleged breach occurred more than ten years ago;
 - b. the Complaint has previously been investigated by the Committee or by a comparable committee.
5. The Committee shall also have the authority to advise the Executive Board not to consider a Complaint if, following an initial assessment, it concludes that:
 - a. the Complaint is manifestly unfounded;
 - b. the Complaint is manifestly of insufficient significance;
 - c. the Complaint relates exclusively to a professional difference of opinion;
 - d. the Complaint is solely attributable to an employment dispute.
6. The Committee shall decide on the admissibility of the Complaint within three weeks of receiving the Complaint. If it concludes that the Complaint is inadmissible, it shall immediately submit its advice to the Executive Board.

The Executive Board shall then decide on the admissibility of the Complaint as soon as possible and shall communicate its decision to the Complainant and the Respondent. If it is decided not to proceed to a substantive examination of the Complaint, that decision shall constitute an initial decision as referred to in Article 6.3, paragraph one. If the Executive Board decides that the Complaint shall be examined on its merits, the Committee shall proceed with the substantive examination of the Complaint.

Article 6.2 Substantive assessment

1. If the Committee deems the Complaint admissible, this shall be reported to the Board of Directors, after which it will proceed to a substantive assessment.
2. Complainant and Respondent may, during the proceedings, be assisted by one of the Confidential Counselors as referred to in Article 4.1, or by another person.
3. The Committee shall request supporting documents from the Respondent(s) and shall give the Respondent(s) the opportunity to submit a response to the Complaint.
4. The Committee shall hear those persons involved in the Complaint whom it considers relevant, including in any case the Complainant and the Respondent. A report will be drawn up following the hearing. The Committee gives the Complainant and the Respondent the opportunity to correct any factual inaccuracies contained in the report.
5. During the hearing, the Complainant and the Respondent may be assisted, but not represented.
6. The Committee shall hear the Complainant and the Respondent separately and in person. The Committee may decide that the Complainant and the Respondent shall be heard in each other's presence. If the hearings take place separately, the Committee shall inform the Complainant and the Respondent, by sending them the written record, of the proceedings that took place during the hearing in their absence.
7. The Committee may hear witnesses and experts.
8. The Committee's hearings are not public.

9. All relevant information collected by the Committee shall be made available to all parties involved, unless the Committee considers there to be compelling reasons to depart from this rule. This shall be set out with reasons in the advice.
10. Within ten weeks after the substantive assessment of the complaint has commenced, the Committee shall issue a report of findings and an advice on the merits of the complaint to the Executive Board. In doing so, it shall apply the assessment criteria set out in the Code of Conduct. The ten-week period may be extended by four weeks by the Committee. It shall notify the Complainant, the Respondent and the Executive Board thereof in writing, stating the reasons. Further extension is possible insofar as the parties involved agree to this in writing.
11. The Committee's advice shall include at least the following:
 - a. a description of the procedure followed;
 - b. a description of the positions of the parties concerned, as well as the views of any witnesses and/or experts consulted;
 - c. whether, in the Committee's opinion, the Complaint is well-founded or unfounded and, if the Complaint is found to be well-founded, which of the classifications referred to in the Netherlands Code of Conduct for Research Integrity should, in the Committee's opinion, be assigned to the breach;
 - d. the reasoning underlying the Committee's opinion.
12. Neither the report of findings nor the opinion is made public. The Secretary of the Commission shall provide the Board of Directors with an anonymised summary of its findings and opinion, intended for publication.

Article 6.3 Follow-up procedure

1. Within four weeks of receiving the Committee's advice, the Executive Board issues its preliminary judgement. The Executive Board shall immediately notify the Complainant and the Respondent of this in writing. The Committee's advice shall be enclosed with the preliminary judgement.
2. Within six weeks of the date of the initial ruling, the Complainant, the Respondent and any other interested parties may request the LOWI to issue an advice on the Executive Board's initial opinion, insofar as it concerns the breach of scientific integrity. Upon request, the Committee shall immediately forward copies of all documents relating to the Complaint to the LOWI.
3. If neither the Complainant nor the Respondent has requested an opinion from the LOWI within the period referred to in paragraph 2, the Executive Board shall determine its final decision on the Complaint.
4. If an opinion from the LOWI has been requested, the Board of Directors shall take the LOWI's opinion into account in its judgment.

Article 7. Publication

Upon completion of the procedure, the Executive Board shall ensure the publication of the public summary referred to in Article 6.2, paragraph twelve, and the anonymised judgment of the Executive Board.

Article 8. Press

Communications with the press regarding a Complaint shall be made by the Corporate Communications Department at the request of the Executive Board, following consultation with the Institution's employee(s) directly involved and the Committee, and with the consent of the Complainant and the Respondent.

If the interests of the Princess Máxima Center are of such significance that withholding consent is not justified, communications with the press may be made without the consent of the parties concerned, the Complainant, and the Respondent(s). The Corporate Communications Department shall inform the parties concerned, the Complainant, and the Respondent(s) in advance of the publication.

The right of the Complainant and the Respondent(s) to grant consent shall likewise lapse if the Complainant or the Respondent(s) has/have themselves approached the press.

Article 9. Protection of those concerned

The Institution's Executive Board shall ensure that the rights of the Complainant and the Respondent are protected and that they do not suffer any undue disadvantage in their career prospects or otherwise. The same shall apply to witnesses, experts, Confidential Counselors, and members of the Committee.

Article 10. Entry into force and publication

This Complaints Procedure was adopted by the Executive Board of the Princess Máxima Center on 6 October 2026 and enters into force on 6 October 2026. This Procedure replaces all previous scientific integrity complaints procedures for Complaints submitted on or after this date. This Complaints Procedure shall be published on the website of the Princess Máxima Center.

This is a translation of the Dutch version of the procedure. In case of a conflict between the English and Dutch version of the procedure, the Dutch version will prevail and will be binding.