

RESPECT COMPLIANCE OFFICE

2023 Annual Report



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Executive Summary

The year 2023 marked significant developments for the EPFL formal complaint office: Respect Compliance Office, [RCO](#). Key milestones included the onboarding of the new RCO officer in May and the launch of the [Trust Point](#) application in September. Additionally, a strong collaboration was established between the RCO and various support, prevention instances of the [Trust and Support Network](#) such as HR, EDOC.

The year saw a notable increase (20%) in cases handled by the RCO, with 32 new complaints and 5 carried over from 2022. This anticipated rise underscores a growing trust in the complaint system, though it remains to be further nurtured, particularly among professors. Of the 32, the RCO committee recommended two cases for external investigation to the EPFL President, while the rest were resolved internally through collaborative efforts, and a few are still on-going (11).

Additionally, the RCO officer and coordinator held 35 preliminary confidential and informal meetings, offering individuals a platform to explore their situations and options. These consultations mainly revolved around allegations of psychological harassment, with formal complaints ensuing in half of the cases.

In 2023, a significant effort was dedicated to raising awareness of EPFL's support and complaint systems. This was achieved in partnership with the TSN lead with regular and formal meetings and participation in events like Vivapoly and EPFL Services Day, and ongoing dialogue with Deans and their deputies.

Looking ahead in 2024, the RCO remains in a transitional phase. While trust in the system has improved, further efforts are necessary to foster this trust, streamline processes, clarify the roles of institutional bodies, and enhance communication. A major objective is to improve the tools available to the RCO, reorganize and expand the committee to a better representativity, and ensure clearer regulations and stronger partnerships.

The analysis of complaints, alerts, and the use of the Trust Point clearly demonstrates that the RCO is widely utilized by the entire EPFL community.

Introduction

In January 2021, the Task Force on Harassment and the Promotion of a Culture of Respect was established at EPFL. Over the next two years, this Task Force conducted in-depth analyses, leading to the creation of a comprehensive, multi-tiered system for prevention, support, and complaint management. This system is structured into three key levels:

1. **Prevention, Initial Assistance, and Support:** Trust and Support Network (TSN)
2. **Complaints Management:** Respect Compliance Office (RCO)
3. **External Investigation**

This framework is detailed in the new Lex on psychosocial risks (LEX 1.8.3), in force since June 2023. Complementing the existing Lex for witnesses or Directive concerning whistleblowing (LEX 1.8.1), it applies to all individuals involved in professional or academic activities at EPFL.

The implementation of LEX 1.8.3 led to the establishment of the Respect Compliance Office (RCO), which took over the functions of the former Respect Cell. The RCO collaborates closely with prevention and support services, while external investigations, mandated by the EPFL President, are conducted by external lawyers under the oversight of EPFL Legal Affairs.

While this transition has realized many of the Task Force's objectives, it has also highlighted the need for ongoing adjustments. These are essential to address the diverse and complex situations encountered and to adapt to evolving internal processes. This continuous learning approach enables EPFL to refine and enhance its strategies, fostering a respectful and supportive environment across all academic, working, and research activities.

Trust Point is a tool to guide you through the prevention, support, and complaint systems at EPFL.

Key new elements of LEX 1.8.3

Scope of application (Art. 2):

A key new aspect of the RCO is its focus on individuals directly impacted in a situation. As such, the LEX applies to anyone who believes that their health or personality has been compromised in connection with their professional or academic activities at EPFL, including employees, students, or guests.

If someone wishes to report alleged illegal or unethical behavior that they have observed at EPFL but that does not directly affect their physical or mental health or personality, they should refer to the LEX on Whistleblowing (LEX 1.8.1).

Handling of complaints (Art. 6):

The Respect Compliance Office (RCO) at EPFL is led by a full-time Respect Compliance Officer. A key enhancement introduced by the RCO is the option to request an informal, confidential preliminary meeting. This meeting can be held with either the compliance officer, who is a professional in complaint management, or the coordinator, a trained lawyer.

During this meeting, individuals are provided with comprehensive information about the complaint process, including its implications, potential consequences, timing, and how confidentiality is managed. The session also allows individuals to discuss any doubts they may have about filing a formal complaint and to explore alternative measures, such as mediation, HR follow-up, or other support actions. Perhaps it is better to clarify that the RCO is not the place for formal mediations (this falls under the scope of the Person of Trust).

This preliminary meeting, which has been widely used, ensures that individuals are fully informed and supported from the very beginning of their approach. We might add that this meeting is also important to find out whether the topic falls within the scope of the RCO to assess its relevance.

Confidentiality, and good faith (Art. 8, 9 10 and 19 para 2)

The LEX underscores the obligation of confidentiality, the option for recusal, and adherence to the principles of good faith and non-retaliation.

LEX, as applied by the RCO, grants specific rights in the process of resolving complaints, including the right to support, confidentiality, and the presumption of innocence. These rights apply to both the complainant and the subject of the complaint, ensuring their personal rights and dignity are fully respected. Everyone within the EPFL community, regardless of their status or position, benefits from neutral and impartial case management when analyzing the context of the complaint. Moreover, EPFL is committed to protecting both complainants and the subject of the complaint from any form of intimidation, retaliation, or discrimination. The complainant's consent is obtained at every stage of the process, particularly regarding the sharing of information.

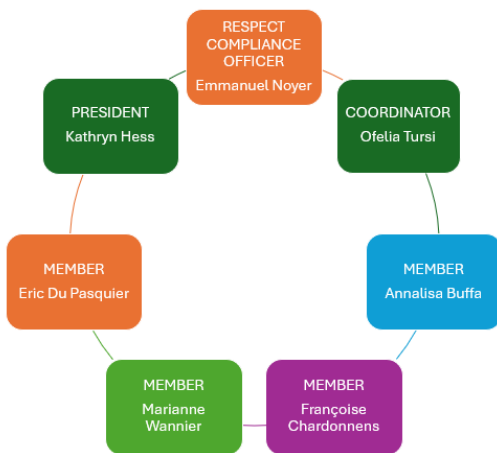
In cases where criminal offenses have been committed, the Respect Compliance Office (RCO) is obligated to refer these cases to the relevant public authorities, with the complainant being duly notified.

This approach reinforces our commitment to transparency and integrity, safeguarding confidentiality and the rights of all individuals involved.

Psychological support (Art. 11)

Anyone contacting the Respect Compliance Office can request psychological support if needed. To protect its community members, EPFL has committed to covering the cost of five to ten psychological sessions for both the complainant and the subject of the complaint if they are impacted by the situation.

Composition of the Respect Compliance Office in 2023



Respect Compliance Officer: Emmanuel Noyer (since May 2023)

RCO Coordinator: Ofelia Tursi

President: Prof. Kathryn Hess

Members:

- * Françoise Chardonnes, Head of Legal Affairs
- * Marianne Wannier, a.i. Head of Human Resources (since June 2023)
- * Eric Du Pasquier, Director of the department of Security, Safety and Facilities Operations
- * Annalisa Buffa, Associate Vice President for Postgraduate Education

The names of the committee members are publicly available on the [EPFL website](#), ensuring transparency and accessibility for the community.

Functioning of the RCO

The RCO office currently comprises a full-time Officer and a part-time Coordinator (40%), with plans to add administrative support to ensure prompt handling of new requests and complaints. Both the Officer and Coordinator offer informal and confidential discussions to understand situations, clarify aspects of the formal complaint process, and provide advice. These preventive efforts help to reduce tensions, provide psychological support, and enable more timely case management.

The committee is co-chaired by the President and the Officer. It discusses all the requests that are received through the respect@epfl.ch email. It meets every 2 weeks, to discuss situations and make decisions or recommendations. Additionally, there is a constant dialogue, sometimes daily, with committee members to advance on the different specific situations. In 2023, the committee held 21 meetings.

Major effort is invested in resolving situations humanely, particularly when an external investigation is deemed inappropriate. The RCO has established strong collaboration with the TSN, ensuring alignment between the formal complaint management system and the prevention and support systems. Extensive partnerships with Schools, the Vice Presidency for Responsible Transformation, and other institutional services have been developed, strengthening community connections and improving adequacy to the academic system.

Resolution steps are determined on a case-by-case basis. The RCO maintains active and prompt communication with all involved parties throughout the complaint process. If a situation is resolved by a specific EPFL service, the file is closed at the RCO level, and the complainant is informed, respecting confidentiality. In the event of a recommended external investigation by the RCO to the EPFL President, the RCO closes the file and transfers responsibility to Legal Affairs. In the event of a recommended external investigation by the RCO to the EPFL President, the RCO closes the file and transfers responsibility to Legal Affairs. All parties involved, including the complainant and the subject of the complaint, are informed of this transition

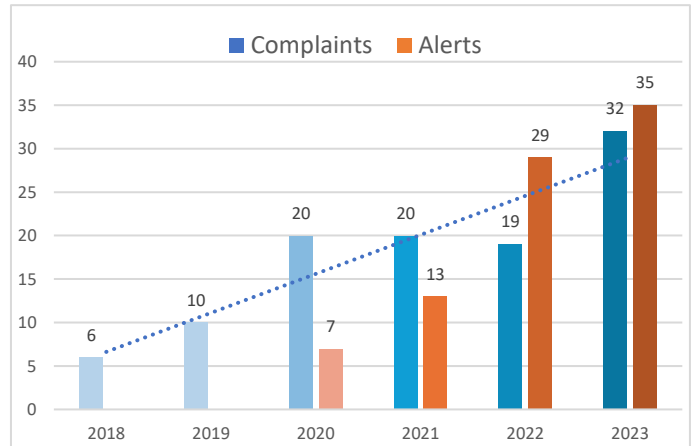
Objectives for improvement

Reflections are ongoing regarding the composition of the committee to ensure greater representation of the various entities within the EPFL community. A new committee structure will be proposed to the new leadership by late 2024 or early 2025. Additionally, the RCO regulations will be established, providing clarification on the respective roles of the Officer and the committee President, as well as expanding the committee to enhance the representation of the school's community.

The RCO will pursue and enhance its interactions with other academic partners (professors, deans, EDOC, etc.) to exchange and discuss best practices. Interactions with TSN professionals (Person of trust, occupational health, nurse consultation, social consultation, psychotherapeutic consultation at CHUV, as well as human resources, legal affairs, security department, equal opportunity office, etc.) will also be strengthened and streamlined to identify which situations would benefit from de-escalation and which require a recommendation to the President for external investigation.

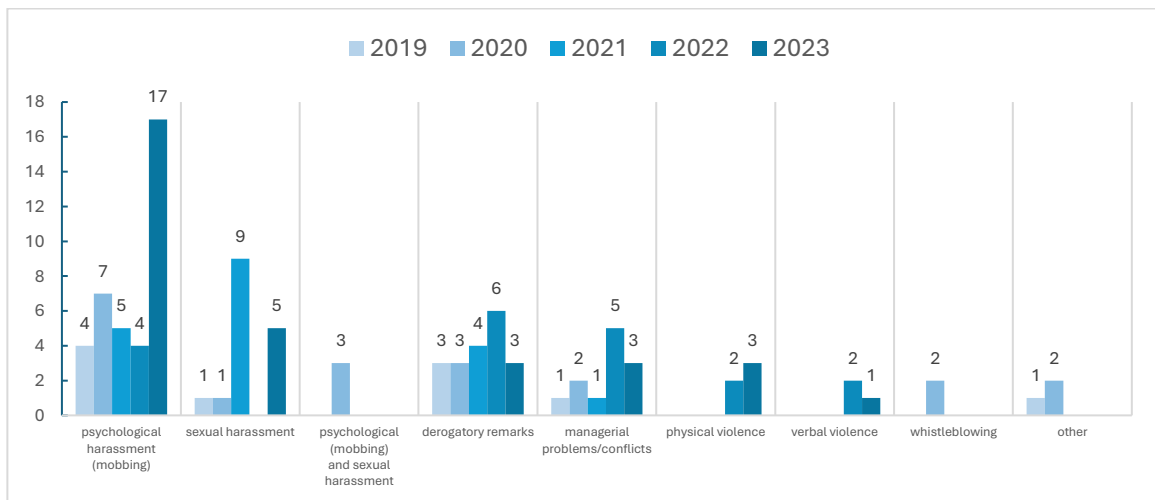
2023 Activity analysis

Between 2019 and 2023, the number of new complaints handled by the RCO per year has gradually increased, from 10 to 32, with a plateau at approx. 20 during the COVID period. The number of alerts has followed a parallel trend. Alerts refer to any other contacts made with the RCO for advice, analysis, opinions, or informal and preliminary discussions that do not constitute direct complaints by individuals.

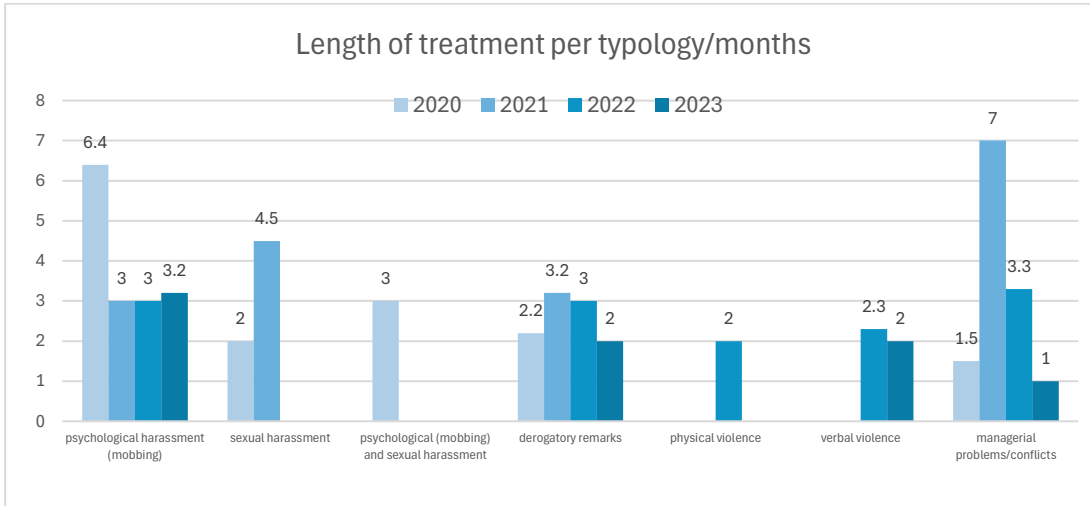


Types of complaints Handled by the RCO

Complaints have been classified as: psychological or sexual harassment, physical or verbal violence, managerial issues or derogatory remarks. In 2023, a high number of alleged psychological harassment cases were filed. Where this is punctual, or a trend will be analyzed in 2024.



The RCO is striving to reduce the time required to resolve situations. Depending on the types of situations, in 2023, the resolution took between 1 and 3 months.



It is important to highlight that formal complaints rarely result in a presidentially approved investigation by an external lawyer. In 2023, out of the 32 situations managed by the Respect Compliance Office, only 2 cases required external investigation. This pattern of low numbers has remained consistent since 2020.



These two cases either involved confirmed harassment, leading directly to a disciplinary investigation, or presented multiple, complex factors that necessitated a deeper analysis through an external investigation.

In 2023, out of the 30 unresolved situations, 21 were successfully concluded through mutual agreement between the parties involved, avoiding formal sanctions. The complainant’s needs were addressed, and the cases were closed. As for the other situations, 5 required collaborations with institutional instances, 1 was transferred to the ombudsperson, 1 was mediated by the Person of Trust, and 2 were escalated to the disciplinary actions with RCO involvement.

Some situations extend beyond a single calendar year. For example, 5 cases that began in 2022 continued into 2023—2 of which required external investigation, while 3 were managed by the RCO. One situation from 2021 also carried over into 2023, handled jointly by the RCO and other EPFL instances.

It is also possible for a case to be reopened if new allegations arise, or additional information comes to light. This occurred in 3 situations during 2023.

2023 Alerts

The community can approach the RCO without filing a formal complaint, a process referred to as a “discussion or alerts.” The number of such case has increased from 2020 to 2023, playing a crucial role for several reasons:

- **Understanding the Complaint Process:** Gaining information on how to file a formal complaint, understanding the potential consequences, and knowing the steps to take afterward.
- **Reporting Incidents:** Sharing incidents related to promoting a more respectful campus experience.
- **Requesting Help or Clarification:** Seeking assistance or clarification on EPFL procedures and support services, particularly concerning LEX 1.8.3 and 1.8.1, depending on the topic and audience.
- **Addressing Disruptive Behavior:** Reporting disruptive behavior without formally accusing a specific person, while seeking information about the entire system established by EPFL.

The alerts cover a wide range of topics, serving as the primary gateway for addressing requests related to help, clarification, or interventions on issues tied to EPFL's values. All these different requests are handled by our office builds trust in the RCO.

Even without a formal complaint, the RCO can intervene to implement protective measures for those in need.

These alerts are highly valuable for the RCO, as they often highlight areas where improvements in prevention, procedures, and communication are needed. Such changes can then be implemented in collaboration with various EPFL instances, such as EPFL security, HR, or occupational health.

Communication in 2023

- During 2023, [the 2022 annual report](#) was published to continue the work started in 2021 of increasing trust in and transparency of the RCO's activities.
- At the start of the Respect Compliance Officer's job, there was [an article to present Emmanuel Noyer's background](#) and experience in the field and his active past in a similar complaints service in the Geneva office of Médecins sans Frontières.
- In order to increase trust in the system, communication about the handling of emails to the Respect mailbox was improved; persons who send an email receive a confirmation of receipt with important information regarding contacts for emergencies on campus available 24 hours a day (internal and external telephone contacts, and via the EPFL Campus application), information about the TSN (Trust and Support Network) and the [Trust Point](#), as well as contact details for external help associations outside of EPFL for immediate professional assistance.

Improving RCO visibility

It is crucial for the RCO to build trust in the system and increase the visibility of the services offered. The major effort during 2023 was to raise awareness of the system and, above all, to make it clear and understandable. To achieve this, a great deal of energy was devoted to disseminating information at various levels, through presentations across different areas of EPFL, in partnership with the TSN.

As examples, but not exhaustively, some of the participations are listed here.

- Information stands at EPFL information events and thematic or festive events: *Vivapoly 2023 on 1 June 2023, Journée des services EPFL on 26. 09.2023, Jours Santé 2023 the week of 9-13 October;*
- TSN-RCO presentations: *Welcome Day 13.09.2023, PolySi 06.09.23, Coaching 13.09.23, Peer2Peer 15.09.23, Mentors 19.9.23, Section Directors' Council 19.09.23, Doctoral Commission 28.09.23, Associations 03.10.23, Delegué.es 05.10.23, Admin Assistants 16.11.23, Social Partners 01.11.23;*

Other efforts to promote visibility included: *meeting with PhD student representatives of IC, regular exchange & learning with ETHZ and with UNIL, revision of the Compliance Guide, info session in partnership with ENAC EDI office, EDMX mentor annual meeting, EDOC mentor training in conflict resolution, meeting with Legal Affairs and student delegates, participation to a STI Counsel, a SV Faculty meeting, a COSEC meeting.*

A cornerstone of the work of the TSN and the RCO was **the development of a new support tool called [Trust Point](#)**, accessible via the EPFL website and the EPFL Campus app. This initiative streamlines the establishment of a single and unified entry point of the system, as fixed in LEX 1.8.3.

As a specific initiative, RCO supported the development of an ethics charter that must be signed by all students working as Student Assistants in teaching.

In collaboration with the ENAC Dean, the RCO also promoted the architecture climate survey.

Conclusions

The establishment of the Respect Compliance Officer (RCO) in May 2023 marked a major **improvement in the personalized handling of complaints, enhancing both the quality and speed of the process**. This progress built on the new legal framework, which defined the RCO's objectives, support mechanisms through TSN, and its guiding principles.

The partnership between the RCO and TSN has proven to be both logically complementary and crucial. Their cooperation is key during both the prevention phase and the formal complaint management phase. Many discussions initiated by TSN have been escalated to the RCO, demonstrating the effective and ongoing collaboration that should be sustained.

A critical area of focus has been clarifying the roles and responsibilities of both entities, as some confusion has arisen. Personalizing these units by associating faces with them has been a significant step forward. The introduction of a joint member, who splits their time equally between both units, has greatly facilitated communication and helped avoid duplication or gaps in service.

Maintaining a high level of trust in these services remains an ongoing challenge. While significant efforts have been made to increase visibility, continued attention is necessary due to the turnover and size of the EPFL community.

Objectives for 2024 and beyond

1. Enhancement of Complaint Management

- Improvement of complaint management tools and processes.
- Better management of the @respect address, including archiving, and case/complaint tracking.
- Implementation of committee operating rules, covering internal rules for precautionary/protective measures, decision-making processes, quorum, conflict of interest, etc.
- Hiring of a part-time administrative assistant to support tasks such as scheduling appointments, maintaining and enhancing the digital report archive, and assisting with the significantly increased administrative workload of the RCO.

2. Leadership and Organization

- Appointment of a new RCO president and management of internal tasks.
- Proposal for a new committee composition.

3. Support and Follow-up

- Improved follow-up on psychological care reimbursement.
- Recommendations and follow-up for external investigations.
- Establishment of a respectful procedure for handling "Alerts" which are situation raised without an official complaint (LEX 1.8.3), focusing on situations where no further action is requested.

4. Partnerships and Networks

- Strengthening partnerships with internal stakeholders, including developing a communication strategy with the academic community to increase awareness of their responsibilities regarding respect, and collaborating with EPFL student associations for support.
- Development of an internal network (HR, risk committee [CRM], TSN) and an external network (ETHZ, other universities, and compliance entities such as RTS, CHUV, MSF).

5. Awareness and Outreach

- Information and awareness-raising initiatives among employees of associated campuses.