Directive concerning occupational health, safety and security at EPFL

1 December 2012, status as at 29th April 2024

The Direction of the Ecole polytechnique fédérale de Lausanne,

based on Articles 6, 35, 36a and 46 of the Loi sur le travail¹

based on Articles 7 and 9 of the Loi fédérale sur l'assurance-accidents²

based on Articles 36g, 36h and 36i of the Federal Act on the Federal Institutes of Technology³

based on Article 10 (a) of the Loi sur la participation⁴

based on Articles 3, 4, 5, 6, 7, 8, 11a and 11d of the Ordonnance sur la prévention des accidents⁵

based on Articles 2, 3, 5 and 7 of the Ordonnance 3 relative à la loi sur le travail (Protection de la santé), 6

based on Article 4 of the Ordonnance sur la protection de la maternité⁷

based on Articles 27 ff. of the Loi sur le personnel de la Confédération⁸

based on the Ordonnance sur la protection des données personnelles dans le domaine des EPF⁹,

hereby adopts the following:

Section 1 General provisions

Article 1 Principles and scope of application

1 The present directive governs the stakeholders, tasks and responsibilities in the field of occupational health, safety and security (OHSS). It specifies the responsibility of all those who must work as part of a network at EPFL. It also forms an integral part of risk management, in accordance with the directives of the CEPF¹⁰ and EPFL.¹¹

² In terms of safety and general security, the present directive applies to all persons present at all sites of EPFL, with or without a contractual relationship, including researchers, teaching staff, doctoral students, other students, other EPFL staff, academic visitors, the various associations recognised by EPFL, as well as companies working under contract.

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¹ LTr; RS 822.11

² LAA; RS 832.20

³ RS 414.110

⁴ RS 822.14

⁵ OPA; RS 832.30

⁶ OLT 3; <u>RS 822.113</u>

⁷ RS 822.111.52

⁸ RS 172.220.1

⁹ RS 172.220.113.42

¹⁰ Directive du Conseil des EPF du 4 juillet 2006 concernant <u>la gestion des risques des EPF et des établissements de recherche</u>.

¹¹ LEX 1.4.3; Risk Management Regulations at EPFL

³ In terms of occupational health and security, the present directive applies to all persons present at all sites of EPFL under a contractual relationship, including researchers, teaching staff, doctoral students, other EPFL staff, academic visitors, and students when conducting activities in a research unit, as well as companies working under contract.

Article 2 Objectives of the Directive

- ¹ The present directive specifies the tasks, duties, obligations and responsibilities in the field of OHSS that fall to the various hierarchical and organisational levels of EPFL.
- ² The aim is to establish a safe, healthy, respectful and enjoyable working and study environment in which the EPFL community thrives.

Article 3 Responsibilities and powers of the EPFL Direction

- ¹ The EPFL Direction is responsible for OHSS.
- ² It establishes the objectives and duties relating to OHSS and provides the Vice Presidencies and Schools with sufficient means and resources to implement the OHSS rules and ensure compliance with them at all levels of EPFL's operations.
- ³ The President delegates the following responsibilities:
 - a) to the Vice Presidency for Operations (VPO): proposing strategic options, the operational management of security and the coordination of all those involved in EPFL's Schools, Colleges and other units by the Department of Security, Safety and Facilities Operations (DSE)¹² and the promotion of health and security within the EPFL community.
 - b) to the Vice Presidency for Academic Affairs (VPA): the promotion of health and safety in the context of education, research and instructors' careers¹³.

Section 2 Delegation to VPO

Article 4 Duties of the DSE

- ¹ The Department of Security, Safety and Facilities Operations (DSE) of the VPO provides strategic guidance and operational management of occupational health and safety through its services: Occupational Health and Safety (OHS); Intervention and Safety (SIS); Operations (EXPL) and Services (INT).
- ² The DSE oversees the organisation of security on all EPF campuses.
- ³ It establishes and monitors the occupational safety and health (OSH) standards applicable to EPFL as a whole and is responsible for compliance with the directives and recommendations required by the official supervisory bodies in relation to OSH. These standards and recommendations are validated by the Director of the DSE in the form of Supplementary Technical Guidelines as per Article 5 of the present directive.
- ⁴ It assists the units in implementing the directives and recommendations issued.

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¹² According to Art. 13 (1) of LEX 1.1.1, Ordinance on the Organisation of the EPFL

¹³ According to Art. 9 (2) of LEX 1.1.1; Ordinance on the Organisation of the EPFL

Article 5 Complementary technical directives

The complementary technical directives refer to a specific technical area or to particular procedures and specify the applicable legal framework. They cover technical areas such as the use and storage of gases and chemicals, the handling of nanomaterials and pathogenic or genetically modified organisms, the use of 3-D printers, hazardous waste management and radiation protection. They also include the various technical standardisation manuals published by EPFL's Operations Department.

² They are drawn up by the DSE in accordance with the applicable legislation and the present directive. They are kept up to date by the DSE.

Article 6 Duties of the Intervention and Safety Service (SIS)

1 The SIS ensures the protection and security of people and infrastructure on EPFL campuses as well as first aid.¹⁴

- a. It is responsible for drawing up and implementing the security, safety and intervention plans, including but not limited to the following areas:
 - fire protection
 - security at events
 - access to infrastructure
 - CCTV surveillance
 - site surveillance
 - first aid
 - response plans
- b. It handles security incidents in conjunction with the federal and cantonal authorities.
- c. It operates an Alarm and Engagement Center (CAE) and an emergency response unit (GIU) 24 hours a day, every day of the year.

Article 7 Duties of the Occupational Safety and Health Service (OHS)

¹ The OHS Service is EPFL's competence centre for implementing its internal occupational health and safety measures.

 a. It is responsible for implementing the plan defined in the Directive relative à l'appel à des médecins et autres spécialistes de la sécurité au travail (Directive MSST, Federal Coordination Commission for Occupational Safety) for safety, occupational health and

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³ Once validated by the Direction of the DSE, they are published on the EPFL's occupational health and safety website: <u>link</u>.

¹⁴ As per Articles 36g ff. of the Federal Act on Federal Institutes of Technology (ETH Act), the currently valid standard and directives of the Association des établissements cantonaux d'assurances incendie (AEAI), Art. 15 of the Loi sur le service de défense contre l'incendie et de secours (LSDIS), Art. 36 of Ordonnance 3 relative à la loi sur le travail (OLT 3) and the directives MSST 6508

health promotion in companies¹⁵ and provides support for organising security in the Schools, Colleges and various units of EPFL.

- b. The OHS Service employs occupational safety and health specialists in accordance with the Ordonnance sur les qualifications des spécialistes de la sécurité au travail. ¹⁶ These specialists must, in particular:
 - Assess the safety aspects of the work environment;
 - Ensure the hygiene and ergonomics of the workplace;
 - Maintain a hazard register;
 - Conduct risk analyses in collaboration with users;
 - Conduct security audits;
 - Assist users in their search for appropriate corrective measures;
 - Standardise protective equipment and personal protective equipment (PPE);
 - Analyse accidents;
 - Prepare and deliver mandatory basic safety training (FOBS)
 - Train unit safety correspondents (COSECs) and assist them in performing their safety activities.
- c. The OHS Service manages the Office of Occupational Medicine and delegates to the occupational doctors the conduct of medical examinations and procedures in connection with the occupational health of employees, students and third parties working in hazardous locations.
- d. It serves as the point of contact for official supervisory bodies in relation to occupational safety and health.
- ⁵ Occupational health issues, particularly collaboration with occupational medicine, are supervised by the OHS in collaboration with Human Resources (HR), which guarantees official secrecy and the protection of personal data.
- ⁶ In collaboration with the security network, the OHS provides mandatory security training (FOBS, COSEC, etc.) to all new staff members employed by EPFL for more than six months.

Article 8 Duties of the Operations Department (EXPL)

¹ The Operations Department is responsible for the operation, maintenance and maintenance of the School's technical installations, in particular infrastructure related to the protection or security of persons or infrastructure.

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⁷ It initiates or participates in healthcare activities with the EPFL community.

¹⁵ MSST stands for "Recruitment of occupational physicians and other occupational safety specialists". The term also refers to the implementation of a 10-point security system in companies posing particular hazards:

¹ Security charter, security objectives

² Security organisation

³ Training, instruction, information

⁴ Safety regulations

⁵ Determination of hazards, risk assessment

⁶ Measures to be taken and their implementation

⁷ Response organisation

⁸ Participation

⁹ Health protection

¹⁰ Monitoring / Auditing

¹⁶ The tasks and functions of the OHS specialists are specified in Article 11 (e) of the Ordonnance sur la prévention des accidents et des maladies professionnelles and are expanded in Annexe 2 to the directive FCOS 6508.

Article 9 Duties of the Services Department (INT)

¹ The Services Department's duties include the implementation and monitoring of the cleaning of the premises as well as the management of EPFL's waste. In particular, it ensures the collection of waste hazardous to human beings and the environment and ensures that it is disposed of in accordance with the applicable rules and directives. The Services Department also ensures that locations in which hazardous activities are conducted are cleaned in accordance with the applicable rules and directives.

Section 3 Delegation to VPA, Schools and Colleges

Article 10 Duties of the VPA

- ¹ The VPA supports the promotion of safety and health through education and research. This consists of:
 - a. for research:
 - incorporating health and safety considerations from the beginning of researchrelated processes (loan application, project evaluation, etc.).
 - promoting occupational health and safety tasks to professors, post-doctoral and doctoral students, as well as to directors and managers of centres or platforms.
 - b. for education:
 - promoting the basic concepts of OHSS, both as regards students and the Doctoral School. For this purpose, the VPA relies on the competencies of the DSE/OHS.
- ² The VPA takes into account aspects of OHSS in the careers of professors or directors or managers of centres or platforms.

Article 11 Role of the schools and colleges

- ¹ The School Dean or the College Director is primarily responsible for the implementation in his or her School or College of the OHSS legislation, the rules and directives of the DSE, and the complementary technical directives: <u>link</u>. He or she verifies that instructors and unit leaders meet the OHSS obligations and fulfil the DSE's occupational health and safety requirements.
- ² He or she ensures that the necessary resources are allocated for the purpose of compliance with the SSST rules.
- ³ He or she verifies that the measures requested in audits of his or her school by the supervisory bodies (SDO, SECO, SUVA, CEPF, DGE, etc.) are implemented.

Section 4 Roles and duties within units

Article 12 Responsibilities of the professor or the head of unit

¹ By virtue of their managerial function, professors and other unit managers ensure the implementation of and compliance with occupational health, safety and security regulations in the teams they manage.

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² It is responsible for establishing and implementing the security plans developed in the Directive technique complémentaire à la LEX-1.5.1 – Cahier de normalisation or determined by risk analyses during security audits and inspections.

- ³ In their respective units, they establish a day-to-day security management system that is capable of ensuring:
 - a. The implementation of work procedures in accordance with OHSS legislation, the regulations and directives of the DSE and the complementary technical directives: link.
 - b. The monitoring of recognised best work practices in their respective fields.
 - c. The implementation and follow-up of corrective actions requested by the supervisory authorities and the OHS Service.
- ⁴ They may appoint a Security Correspondent to ensure the monitoring of these items (cf. Art. 13).
- ⁵ With the assistance of OHS, they ensure that they obtain the licences required for the procurement and handling of hazardous (biological, radioactive, chemical) products and undertake to comply with the regulations on the storage, use and disposal of such products.
- ⁶ They participate in security audits of their units.
- ⁷ They release their employees for compulsory basic security training (FOBS) provided by EPFL's DSE.
- ⁸ They encourage the involvement of their employees who are part of the volunteer firefighters and rescue workers' organisation. In particular, they must be released for training and work in the event of disasters. This activity is an integral part of the employee's job description.
- ⁹ They are responsible for appointing a safety officer for a specific hazard, such as the handling of organisms (BSO)17, or working with ionising sources (RPO)¹⁸, in accordance with the appropriate technical directive. This role is defined in the employee's job description.

Article 13 Security correspondent (COSEC)

- ¹ Professors and heads of unit are by default the security correspondents (COSEC) for their unit.
- ² They may delegate this task to an experienced employee, and this task is to be included and described, along with its intrinsic requirements (in terms of experience and training), in the employee's job description (CDC).
- ³ A COSEC may be responsible for multiple units.

Article 14 Tasks and qualifications of the security correspondent (COSEC)

- ¹ The role of the COSEC is to:
 - a. Transmit the information sent by the DSE to the unit staff.
 - b. Inform the new staff, interns or students, as well as the academic visitors, of the security rules specific to the unit's activities and facilities.
 - c. Inform the OHS Service of any safety-related changes in the unit, such as new hazards, modifications to facilities, new activities and scale-ups of experiments.

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² They ensure the identification of the hazards and the potential risks associated with their unit's projects and verify with the DSE that these hazards and potential risks have been properly assessed. They ensure that their employees are informed of the protective or mitigation measures to be taken. They also ensure that any change in activities or any significant change in an experimental process is re-evaluated.

¹⁷ LEX 1.5.3

¹⁸ According to the Directive technique complémentaire à la LEX 1.5.1 – Travail avec des sources ionisantes.

- d. Implement and enforce the occupational health and security rules issued by EPFL in the form of directives, supplementary directives or standardisation document.
- e. If the function has been delegated to her/him, inform the professor or direct supervisor of any security-related problems in her/his unit (dangerous behaviour, refusal to wear safety equipment, hazardous handling of reagents or waste, etc.).
- f. Inform the DSE, or ensure that the DSE is informed, of security-related incidents or accidents via the dedicated tool.
- g. Where applicable, create and update "door safety sheets" on an annual basis.
- h. Where applicable, periodically check and update first aid equipment (e.g. eye rinses, first aid kits).
- ² The COSEC must be a person who has:
 - a. The training and experience required to perform the security duties assigned to him or her. Therefore, the role of COSEC should not, for example, be assigned to a doctoral student.
 - b. Knowledge of and expertise in handling unit-specific hazards.
 - c. Insight into the unit's activities and associated risks.
 - d. If the COSEC function has been delegated to him or her, he or she must have the authority to impose the OHSS rules in relation to the unit's activities.
- ³ The COSEC serves as the DSE's contact person within the unit.

Article 15 Responsibilities of EPFL employees

- ¹ All employees of EPFL must follow the laws and ordinances governing occupational health and safety, as well as the safety guidelines established by the DSE.
- ² In particular, they must use the personal protective equipment identified in the risk analysis or required by law and must not compromise the effectiveness of the security facilities and protective equipment.
- ³ Employees must be aware of what is happening in their work environment, be able to respond to warnings from colleagues and be able to hear alarms.
- ⁴ If an employee identifies a defect or a danger to his or her health or safety or that of another, he or she must immediately inform his or her direct supervisor and the COSEC of the unit.
- ⁵ In case of imminent danger, the employee must contact the existing emergency number, warn his or her colleagues immediately and not expose himself or herself to further danger.
- ⁶ To be able to carry out his or her duties, the employee must ensure that he or she receives the necessary training to understand the hazards associated with his or her activities and to learn how to protect himself or herself from them.
- ⁷ He or she must report any incident or accident via the reporting platform made available to employees. The employee's direct supervisor and the COSEC of his or her unit must also be informed.
- ⁸ The employee must obtain information on alarm systems, evacuation procedures and emergency equipment (extinguishers, emergency showers, eye rinses, emergency buttons, etc.). He or she must participate in security drills (evacuation, fire-fighting) organised by EPFL.
- ⁹ As soon as bachelor's and master's degree students have access to the research laboratories, technology platforms and workshops, they are subject to the same responsibilities as the EPFL staff.

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Section 5 Data protection

Article 16 Health-related data

- ¹ Health-related personal data is sensitive data. It is subject to medical confidentiality.
- ² Only the following units are authorised to process health-related personal data:
 - the Office of Occupational Medicine (OHS-ST), which is the unit in charge of occupational medicine,
 - occupational hygienists (OHS-HT) to the extent required for the performance of their duties, and
 - the emergency response unit (SIS-INT) when rendering assistance to persons.

Article 17 Data retention

- ¹ Medical records are retained by the medical officer (Art. 47 OPers-EPF) for five years after termination of the employment relationship or studies of the person concerned.
- ² Health data relating to occupational medicine is retained for 40 years after the last exposure or, in the absence thereof, the date of the last medical consultation of the person concerned.¹⁹
- ³ Anonymised data may be retained by EPFL information systems for statistical and research purposes.

Article 18 Social partnership

In accordance with the Loi fédérale sur la participation, social partners contribute to OHSS. They are invited to participate in technical audits and inspections. They are regularly informed about the security situation at EPFL, particularly in the event of a major incident, in which case they are notified as soon as possible. They are informed of the tools in place (database, checklist, etc.) and the activities of the security network.

Section 6 Compliance

Article 19 Implementation of measures

- ¹ The DSE verifies the implementation of occupational health, safety and security measures and verifies compliance with safety regulations and supplementary directives.
- ² In the course of unannounced audits or inspections, it checks the security situation of the laboratories, workshops or facilities made available by EPFL. He ensures that the work procedures comply with the applicable regulations and directives.
- ³ The DSE and its departments may request the immediate implementation of corrective actions in high-risk situations and may require the temporary closure of a laboratory/unit if the assessment of the situation indicates an imminent risk or reveals an uncontrolled security situation. It may require a formal risk analysis prior to the resumption of business and request the submission of evidence that the required measures have been implemented.
- ⁴ The DSE informs the Risk Management Committee (CRM) of any high-risk situations and informs the School or College Dean, or the appropriate Vice Presidency, of any hazardous situations requiring prompt but not urgent attention.

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¹⁹ According to Annexe 4 to the Code de déontologie de la FMH.

Section 7 Final provisions

Article 20 Entry into force

¹ The present directive entered into force on 1 December 2012 and was revised on 15 March 2021 (Version 2.3) and on 29th April 2024 (Version 3.0).

On behalf of the EPFL Direction:

President: Director of Legal Affairs:

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