



Consultation on the Legal texts relating to scientific integrity

(covering *LEX 3.3.2 - LEX 3.3.3 - LEX 1.3.3*)

Date: 30.04.2026

ELSA, Polydoc and EPDA support the overall goal of ensuring scientific integrity is upheld at EPFL and support the clarification of the relevant LEX directives.

We support the 4 values used to define this framework: Reliability, Honesty, Respect and Responsibility.

We wish to emphasize that maintaining scientific integrity is the shared obligation of everyone teaching, studying or performing research at EPFL — and the revised directives are an opportunity to make that obligation clearer and better supported for all.

LEX 3.3.2 — Scientific Integrity and Good Scientific Practice

We support the alignment of terms with the new Code of Scientific Integrity. We also suggest falling back to SNF guidelines where terms or situations are unclear.

We welcome the inclusion of examples on how authorship (Art. 11 – 12) should be discussed and decided early in the process.

The "Supervisor" role (Art. 5) requires better institutional support to ensure supervisors understand their responsibilities. In many cases, PhDs or postdocs are themselves supervising Masters or Bachelor students. It is unclear how EPFL will support these individuals in fulfilling the obligations described in this article. We note that Art. 5 read together with Art. 2 al. 2, 3 of LEX 3.3.3 implies that a supervisor who tolerates misconduct within their team may themselves be found in breach of scientific integrity. Supervisory



responsibility is a genuine obligation, and EPFL should ensure all those exercising it are adequately prepared if they are in this situation.

We recommend that EPFL provide a mandatory onboarding or training module specifically for junior supervisors, covering their responsibilities under LEX 3.3.2 and the implications of Art. 3 al. 3 of LEX 3.3.3.

Reproducibility is a core stake in research, mentioned in Art. 7 al. 1 of LEX 3.3.2. The same article, in al. 3, advises researchers to “contact the services of the Associate Vice Presidency for Research for advice and support” to “adhere to the FAIR principles”. We thank the AVP-R for this commitment, and we suggest the following in order to improve efficiency both from the researchers' and the AVP-R's sides, given the complexity of the matter.

We recommend that EPFL (ie. AVP-R, EPFL Library, Research Office), provide and maintain resources online to help researchers regarding reproducibility, FAIR and research data management. These resources include but are not limited to textual guidelines, software packages, etc.

Art. 9 mentions ethics in the context of research involving human beings or animals. Art. 3 al. 2 lists “Respect” as a guiding principle of scientific study, vaguely integrating elements of ethical research in its definition.

This is a good start, although due to the vagueness of Art. 3, the specificity of Art. 9 to research conducted involving human beings and animals, and the omnipresence of the topic of ethics in the context of scientific research, we recommend the addition of an article ensuring the promotion and the teaching of ethics in a scientific context, especially for PhD students.



LEX 3.3.3 — Procedure in Cases of Suspected Misconduct

We appreciate the detailed list of potential cases of misconduct in Section 2, which provides useful clarity for the community.

It is clear from the LEX, that the Ombudsperson receives all cases. However, in particular for PhDs, thesis directors, section directors and doctoral schools will need clear guidance on distinguishing scientific integrity concerns from other issues such as harassment (covered under LEX 1.8.1 and 1.8.3), as the entry point for reporting differs.

We recommend that EPFL publish a simple decision guide or flowchart — distributed through doctoral schools and HR during employee onboarding — helping individuals identify which procedure and which entry point applies to their specific situation.

Anonymous reports are permitted. However, the directive does not specify how written concerns should be submitted in practice.

We ask that a dedicated webpage or secure webform be created and linked directly in the directive, so that the submission process is unambiguously anonymous.

Both LEX 3.3.2 and LEX 3.3.3 reference the use of AI tools, but the provisions are too vague to be actionable. LEX 3.3.2 states that researchers must use these tools "responsibly and transparently" and comply with "EPFL guidelines," without specifying which guidelines (hyperlink is broken). LEX 3.3.3 requires that AI tool usage be disclosed "appropriately, with regard to the good practices of the discipline concerned."

Scientific staff members are the primary day-to-day users of these tools and face genuine uncertainty about what is required: must one disclose the use of an automated translation tool? A code generation assistant? A syntax correction tool? Do prompts need to be recorded? Does the output need to be saved and stored as research "data"?

"Good practices of the discipline" are by definition evolving and not codified, and a vague reference to unspecified EPFL guidelines cannot serve as a clear standard. This is



particularly complicated when working in an interdisciplinary environment. We have common standards for authorship, but not AI?

We recommend that LEX 3.3.2 or a dedicated annex include a minimum definition of what constitutes appropriate disclosure of AI tool use. These definitions should be updated periodically and transparently. The role of the Principal Investigator in setting AI usage expectations within their research group, and their responsibility for ensuring team members are informed, should also be clarified.

While the directive does not create an explicit duty to report, Art. 11 of LEX 3.3.3 lists the concealment or minimization of misconduct committed by third parties as itself a form of scientific misconduct. We interpret this as knowingly remaining silent about a violation may be sanctionable. We would like to emphasize that maintaining scientific integrity is a collective responsibility.

We recommend that EPFL communicate this point clearly and accessibly to the community, so that members understand the spirit of the obligation without fears in reporting any integrity issues.

The protection of those who raise concerns is welcome, but may be insufficient, where the person being reported could often be colleagues or the direct line manager controlling contract renewal, funding, and future work references. The prohibition on dismissal does not explicitly cover indirect retaliation.

We ask that the directive explicitly list prohibited forms of retaliation, including changes to supervision arrangements, funding conditions, or contract renewal decisions occurring during or within twelve months of a procedure.

The composition of the Evaluation Committee (LEX 3.3.3 Art. 15) includes the Dean of the faculty of the person being investigated. This risks a structural conflict of interest, as the Dean may have personal or institutional relationships with the person under investigation. Although there is a provision (Article 24) for recusal for conflict of interest, we believe that may not be sufficient.

We recommend replacing the Dean with an external scientific expert designated case by case, or making the Dean's participation conditional on a formal written declaration of no conflict of interest submitted to the Ombudsperson.

The directive does not address what happens when a person's contract ends before the procedure is concluded. This applies to both parties — the person who filed the report and the person under investigation. This situation is foreseeable and should not be left unaddressed.

We ask that the directive include an explicit provision stating whether and how the procedure continues when either party's contract ends mid-process, and what protections or obligations remain for both. We believe the case should still be investigated as best as possible to establish the facts and also to improve the guidelines.

The sanctions listed (LEX 3.3.3 Art. 22) do not clearly cover notification to important third parties such as funding agencies, unlike journals which are explicitly noted that can be notified. All parties within the scientific ecosystem from funders to publication should be notified.

We recommend adding an explicit provision to Art. 22 — or cross-referencing Art. 31 more prominently — stating that notification of any relevant third parties and not limited to solely journals, is an available measure.

LEX 1.3.3 — Citation and Referencing of Sources

We have no major objections to this directive and consider the update appropriate.

Member Consultation

In parallel with this response, ELSA EPFL surveyed its members with the following question:

"EPFL will have new legal obligations in regards to Scientific Integrity. The new rules clarify supervisors' responsibilities and the conditions under which concerns may be reported. Which of these concerns you most?"

- I am worried about being held responsible for errors made by students I supervise — **5 votes**
- I am worried about being excluded from papers to which I contributed — **0 votes**
- I am worried about reporting concerns against a senior staff member — will I be protected? — **13 votes**
- I feel well-informed and supported by the current drafts — **0 votes**