



## SETAC Whistleblower Policy

### Preamble

The Society of Environmental Toxicology and Chemistry (SETAC) is committed to high standards of scientific, ethical, moral and legal business conduct. In line with this commitment, SETAC requires SETAC governance members, employees, members, volunteers and guests (including exhibitors and sponsors) to adhere to high standards of personal and professional ethics in the conduct of their duties and responsibilities.

Consistent with SETAC commitment to open communication, this policy aims to provide an avenue for anyone to raise concerns so that SETAC can address and correct inappropriate conduct and actions. Further, this policy provides such individuals reassurance that SETAC will endeavor to protect them from any reprisals or victimization for whistleblowing.

Concerns covered under this whistleblowing policy include:

- Activities (including those in our program, at our events, or in our services or those involving our members) that are not in line with SETAC policies, including the [SETAC Code of Ethics](#), [SETAC Code of Conduct](#) and [SETAC Principles and Values](#), as well as violations of policies and agreements such as the [Conflict of Interest Policy](#) and various confidentiality agreements
- Incorrect financial reporting
- Unlawful activity

### Provisions

*Good Faith Allegation* – Anyone raising a concern must be acting in good faith and have reasonable grounds for believing the information disclosed indicates a violation.

*Harassment or Victimization* – Harassment or victimization for reporting concerns under this policy will not be tolerated.

*Confidentiality* – Every effort will be made to treat the identity of the individual who reported the concern in good faith with appropriate regard for confidentiality to the extent possible, consistent with the need to conduct an adequate investigation.

*Anonymous Allegations* – This policy encourages individuals to put their names to allegations because appropriate follow-up questions and investigation may not be possible unless the source of the information is identified.

Concerns expressed anonymously will be explored appropriately, but consideration will be given to:

- The seriousness of the issue raised
- The credibility of the concern
- The likelihood of confirming the allegation from attributable sources

*Bad Faith Allegations* – Allegations made in bad faith or done maliciously, recklessly or with knowledge of their falsity, may result in disciplinary action.

### Compliance Officers

The SETAC executive directors are responsible for ensuring that all complaints about unethical or illegal conduct are investigated and resolved. The executive directors will do that by working with a committee of responsible

persons consistent with [SETAC's Problem Resolution Procedures](#). They will advise relevant governance bodies of all complaints and their resolution and will report at least annually to the Executive Committee on compliance activity relating to accounting or alleged financial improprieties.

## Reporting

*Procedure* – Concerns can be reported verbally or in writing via email or letter. Concerns reported in writing should preferably be done by filling out the form included at the end of this policy. Otherwise, concerns reported verbally should immediately be noted in such a form.

Reporting options - Concerns can be reported through the following channels:

- Concerns related to breach of SETAC policies, including [SETAC Code of Ethics](#), [SETAC Code of Conduct](#), [SETAC Principles and Values](#), [Conflict of Interest Policy](#), and various confidentiality agreements can be reported to any staff or governance members and should immediately escalate to the relevant SETAC executive director or president, depending on the nature of the issue
- Concerns related to SETAC publications should be reported to the SETAC global executive director, the journal editors, or the SETAC publications director
- Concerns related to scientific integrity in SETAC programs should be reported to the relevant SETAC executive director or science manager
- Concerns related to the executive directors should be reported to the relevant SETAC president or vice versa
- Concerns related to staff should be reported to the relevant executive director
- Concerns related to very serious and sensitive issues relating to unethical or illegal conduct in financial reporting may be reported directly to: Bill McEachern, Esquire of McDonald Fleming Moorhead (attorneys for SETAC); (850) 602-9344; 127 Palafox Place, Suite 200, Pensacola, FL 32502; [bbmceachern@pensacolalaw.com](mailto:bbmceachern@pensacolalaw.com)

*Timing* – The earlier a concern is expressed, the easier it is to take action.

*Evidence* – Although the person raising the concern is not expected to prove the truth of an allegation, the person should be able to demonstrate that the report is being made in good faith with reasonable grounds for believing the information disclosed indicates a violation.

## Resolution

As soon as an issue is reported, SETAC will take appropriate action following the [SETAC Problem Resolution Procedures](#).

*Initial Inquiries* – The appropriate compliance officers will conduct initial inquiries to determine whether an investigation is appropriate and the form that it should take. Some concerns may be resolved without the need for investigation.

*Further Information* – The amount of contact between the complainant and the person or persons investigating the concern will depend on the nature of the issue and the clarity of information provided. Further information may be sought from or provided to the person reporting the concern.

*Closure* – The person reporting a concern as well as the relevant SETAC governance executive committee shall receive information on each report of concern and its resolution. Records will be kept by the SETAC office.

## SETAC Reporting Form

This form is for use by anyone wishing to raise a concern or file a complaint against person or entity associated with SETAC for concerns covered under [SETAC's Whistleblower Reporting Policy](#) to be addressed consistent with [SETAC's Problem Resolution Procedures](#). **Every effort will be made to treat the identity of the complainant in good faith with appropriate regard for confidentiality.**

Do you wish that this concern and any process initiate is kept confidential?  Yes  No

Name of Complainant: \_\_\_\_\_

Affiliation: \_\_\_\_\_

Address: \_\_\_\_\_

Telephone: \_\_\_\_\_

E-mail: \_\_\_\_\_

Name(s) of the person or entity against whom this complaint is being filed:

\_\_\_\_\_

Description of issue of concern.

If the space provided here is not sufficient, please summarize here and describe in detail on a separate sheet of paper. Please attach all relevant documents supporting the allegation.

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

State the specific SETAC policies that you believe were violated:

\_\_\_\_\_

\_\_\_\_\_

Relevant date (e.g., date[s] issue of concern occurred or was noted): \_\_\_\_\_

Please list the name and contact information of any witnesses or individuals who may have information related to your complaint:

\_\_\_\_\_

\_\_\_\_\_

By my signature here, I certify that the information provided here and in any attachments are true and accurate to the best of my knowledge and belief.

Signature: \_\_\_\_\_

Date: \_\_\_\_\_

Please submit this form to the individual outlined in the [Whistleblower Policy](#). For current staff emails and phone numbers, visit [www.setac.org/page/Contact](http://www.setac.org/page/Contact).