

AMERICAN POLITICAL SCIENCE ASSOCIATION

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General

The protection of APSA’s members, employees, volunteers, reputation, assets, and ability to achieve its mission is, and must be, a core responsibility of everyone connected with the Association. This document describes how the American Political Science Association will respond if anyone observes and reports serious and intentional misconduct in the conduct of the Association’s affairs; examples of such misconduct include financial fraud, illegal activity, harassment, discrimination, and abusive behavior. This policy is intended to assure that every such report is taken seriously, that a person making such a report is protected against retaliation as fully as possible, and that reports are used not only to address the fact or appearance of misconduct but also to improve the Association’s ability to prevent any recurrence.

Reportable Misconduct

It is the responsibility of all APSA Council members, APSA Council officers, and employees who witness apparent misconduct to report the events and circumstances (i.e., to act as a “whistleblower”) by following the procedures described in this policy. Reportable conduct includes a violation of APSA policies, government regulations, or the law and any act, or failure to act, which results in obtaining an unauthorized benefit from or inflicting harm on the Association generally or on anyone employed by or volunteering in an administrative capacity for APSA (including serving on a committee created by the APSA Council).

Examples of such conduct include:

- Plagiarism, forgery, or damaging alteration of any document necessary for administration of the work of APSA
- Unauthorized alteration of computer files or other records of the Association
- Creating or publishing misleading financial reports of the Association’s accounts

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- Harassment of or injury to an employee, vendor, agent, or other person or persons in connection with their activities on behalf of the Association
- Discrimination against individuals in federally protected classes or categories in connection with their activities on behalf of the Association
- Pursuit of a benefit or advantage in violation of APSA's Conflict of Interest Policy
- Misappropriation or misuse of APSA resources, funds, supplies, or other assets
- Authorizing or receiving compensation from APSA for goods not received or services not performed
- Authorizing or receiving compensation for hours not worked or reimbursement for expenses not incurred while performing any duty for the Association
- Retaliating in any way against a person who makes a good-faith report of apparent misconduct as required by this policy

This policy is not designed, and will not be applied, to address apparent professional misconduct of a member of APSA unless the conduct is directly related to the administration of the affairs of the Association itself. This policy is also not designed, and will not be used, to address mistakes and inadvertent errors in the everyday affairs of the Association which can be remedied within the scope of standard administrative procedures.

Role of the Audit Committee

The APSA Bylaws provide that the Audit Committee establishes and oversees this Whistleblower Policy. The committee adopted this version of the policy on September 7, 2022 and recommended to the Council that it be included in the Board Policies Manual of the Association.

With the advice of the Audit Committee, the Executive Director contracts with a Reporting Service (currently APSA EthicsPoint) to serve as the principal point of contact for persons observing apparent misconduct. The Audit Committee receives reports on the operation of this policy at least annually and regularly considers whether changes to this policy are desirable or necessary.

Contact for Reporting

The Association contracts with an outside organization which offers the service of receiving confidential communications about reportable misconduct. The Reporting Service, known as [APSA EthicsPoint](#), provides both a confidential toll-free telephone number and a confidential online questionnaire that can be used to document the reportable behavior; either or both may be used by anyone wishing to make a report.

The contact information for the current Reporting Service, [APSA EthicsPoint](#), is published on the Association's public website on an easily accessible page labeled "Whistleblowing" (<http://www.apsanet.org/whistleblowing>). The page includes a description of the procedure for confidential reporting to APSA EthicsPoint (the Reporting Service). The title and online address of this website page are included wherever appropriate in routine business correspondence and other APSA documents in order to make information about APSA's Whistleblowing Policy and related procedures widely available. Direct access to the APSA EthicsPoint platform is available here: <http://www.apsanet.ethicspoint.com/>

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The Executive Director appoints two members of APSA's senior staff as Staff Contacts who will have access to APSA EthicsPoint (the Reporting Service) following any report to the Reporting Service by a person associated with APSA, so that the appropriate course of action can be determined. APSA EthicsPoint (The Reporting Service) and the Staff Contacts will at all times endeavor to maintain confidentiality in the event of a report of conduct covered by this policy.

Reporting

Anyone who observes or experiences apparent misconduct is encouraged to report the conduct by following the procedure described on the Whistleblowing web page (<http://www.apsanet.org/whistleblowing>).

When a report is submitted to APSA EthicsPoint, (the Reporting Service), APSA EthicsPoint will send an automatic confirmation email to the reporter if the reporter supplied their email address with their report. APSA EthicsPoint provides reporters with a unique report key and the option to create a password. Reporters can use this information to log into the APSA EthicsPoint platform to view their submitted report and to communicate with APSA. All of the information, reported facts, and circumstances provided by the reporter will be documented in a report that will be housed on the APSA EthicsPoint platform. APSA will seek to avoid, to the maximum extent possible, any adverse consequence to the reporting individual for any report made in good faith. Based on the information received, APSA EthicsPoint (the Reporting Service) will determine which Staff Contact should be informed of the matter. (If for any reason it is not appropriate to contact either of the designated Staff Contacts, the Reporting Service may contact the Chair of the Executive Committee (the APSA President) to determine the appropriate course of action.)

Follow-up

The Staff Contact or other authorized person (the "Investigator") receiving a report from APSA EthicsPoint (the Reporting Service) is responsible for determining whether there is cause to believe that a violation of APSA policies, government regulations, or the law has occurred. (Note: Every effort will be made to preserve confidentiality of the person who made the report during this process but, in certain circumstances, it may not be possible to do so. Additionally, as explained below, any retaliation against a person who has made a good-faith report to APSA EthicsPoint (the Reporting Service) is, itself, a violation of this policy.) This determination is based on the information provided to APSA EthicsPoint (the Reporting Service) and any other verifiable relevant information obtained by the Investigator. The Investigator (calling upon advice, if necessary, from suitable other persons or relevant committee members) develops a plan of action that responds to the circumstances. The plan may include reviewing records, collecting additional data, conducting confidential interviews with APSA staff, contactors, vendors, and members of the public, and any other forms of investigation that are necessary. The Investigator may consult with APSA leadership or the APSA attorney to determine what, if any, action is required to address the cause of the report.

The Investigator documents the facts and circumstances. If appropriate and possible, the Investigator will discuss the risk of exposure with the reporting individual and, as appropriate, will design subsequent action to avoid, to the maximum extent possible, any adverse consequence. If the investigation requires more than four calendar weeks to complete, the Investigator will contact the Chair of the Audit Committee to explain the reason for the time required and request approval for additional time.

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Based on the information gathered, the Investigator will recommend a course of action to the appropriate APSA official. In most cases, this official will be the Executive Director. If, though, for any reason, the Investigator believes it would be inadvisable to involve the Executive Director, the recommendation may be made to the APSA President or the Chair of the Audit Committee. Upon receiving the recommendation from the Investigator, the appropriate APSA official with review and make a final determination regarding the recommendation.

The recommended course of action may include, but is not limited to, the following: follow-up under the appropriate APSA policies and procedures (for example, the APSA employee handbook or the Procedures for Violations of the Sexual Harassment Provisions of the APSA Anti-Harassment Policy, or other appropriate APSA policy) or dismissal of the report as unfounded. The recommendation may also include proposed personnel actions, disciplinary actions, referral to the APSA attorney, or involvement of law enforcement.

Once a recommended course of action is identified, the APSA Executive Director or the APSA Staff Contacts will communicate it to the reporter and the individual(s) named as the subject of the report. The APSA Executive Director and/or the Staff Contacts will also take the necessary steps to implement the course of action. Implementation may involve applying actions or procedures recommended by an appropriate APSA policy or procedure, as listed above.

The Staff Contact (the Investigator) will include a summary of this report and the course of action in their annual report to the Audit Committee.

Retaliation Prohibited

A person who in good faith reports possible misconduct must not suffer from any form of retaliation including, but not limited to, harassment or adverse employment consequence. Any person who retaliates against someone who has, or is suspected to have, reported apparent misconduct is in violation of this APSA policy. Such incidents, if they occur, will in the normal course of events be investigated as apparent violations of this policy and may result in disciplinary action up to and including termination of employment or severing of an existing relationship to APSA.

Acting in Good Faith

Anyone reporting apparent reportable conduct must be acting in good faith and have reasonable grounds for believing the conduct indicates that there has been a violation of APSA policies, any of the items in the bulleted list of reportable conduct above, government regulations, or the law.

A report that proves not to be substantiated will, in the normal course of events, have no consequences for the person who has made it and will be included in the Staff Contact's annual report to the Audit Committee without identifying reference to the individuals involved or any information that could result in the reporter or individuals being identified. Repeated unsubstantiated reports may in certain circumstances constitute a form of harassment and, hence, constitute a violation of this policy.

Bad-faith Reports

If the result of the confidential investigation of a report of possible misconduct is a determination that the report was made in bad-faith or is a result of malice or hostility on the part of the person making the

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report, the Investigator may consult with the Executive Director, the Chair of the Audit Committee, or the APSA president (as appropriate) to determine a course of action to address this violation of the Whistleblower Policy. The recommendation may include, but is not limited to, termination of employment or severing of an existing relationship to APSA.

Annual Assessment

The Audit Committee receives reports from the Staff Contacts and other Investigators (if any) at least once each year. These reports are made and received with due regard for necessary confidentiality with respect to the details of any reported misconduct and any resulting action. If an event involving misconduct or apparent misconduct has been addressed without involving a Staff Contact, the Investigator responsible must report (again with due regard for confidentiality) the circumstances and resolution to the Audit Committee. In extraordinary and compelling circumstances, an Investigator may make such a report directly to the Chair of the Audit Committee.

The Audit Committee will consider during at least one meeting each year whether such reports or other related information suggest any desirable or necessary changes in the Association's Whistleblower Policy. In addition, the Executive Director may consult with the Audit Committee at any time to identify necessary or desirable changes in APSA policies, administrative procedures, or management controls that may have been suggested by or arise out of any reports of misconduct received.

During its annual review, the Audit Committee may also consider the performance of APSA EthicsPoint, (the Reporting Service) and, in conformity with the terms of the contract, recommend to the Council or the Executive Director any revision or change that seems appropriate, as it pertains to the Whistleblower Policy.