



# **The International Initiative for Impact Evaluation**

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## **Whistleblower Policy**

February 2009

The purposes of this Whistleblower Policy of the International Initiative for Impact Evaluation, Inc., (“3ie”) are to: (1) encourage Commissioners, officers, members, staff and other volunteers of 3ie to come forward with credible information on illegal practices or serious violations of adopted policies of 3ie; (2) specify that 3ie will protect the person who comes forward from retaliation; and (3) identify where such information can be reported.

**1. Encouragement of reporting.** 3ie is committed to maintaining a workplace where employees are free to raise good faith concerns regarding 3ie’s actions. Employees are encouraged to report suspected violations of the law on the part of 3ie, its leadership, or by others on its behalf; to identify potential violations of 3ie policies; and to provide truthful information in connection with any official inquiry or investigation. Appropriate subjects to raise under this policy would include financial improprieties, accounting or audit noncompliance matters, ethical violations, or other similar illegal or improper practices or policies.

**2. Protection from retaliation.** 3ie prohibits retaliation by or on behalf of 3ie against persons for making good faith complaints, reports or inquiries under this policy or for participating in a review or investigation under this policy. This protection extends to those whose allegations are made in good faith but prove to be mistaken. 3ie reserves the right to take legal action against or discipline persons who make bad faith, knowingly false, or vexatious complaints, reports or inquiries under this policy or who otherwise abuse this policy.

**3. Confidentiality.** Confidentiality is a priority, and the identity of complainants and their complaints will be treated confidentially to the fullest extent possible. Nonetheless, 3ie cannot guarantee confidentiality. 3ie will keep the whistleblower’s identity and complaint confidential, unless (1) the person agrees to be identified; (2) identification is necessary to allow 3ie or law enforcement officials to investigate or respond effectively to the report; (3) identification is required by law; or (4) the person accused of fraudulent or dishonest policy violation is entitled to the information as a matter of legal right or disciplinary proceedings.

**4. Where to report.** Complaints, reports or inquiries should describe in detail the specific facts demonstrating the bases for the complaints, reports or inquiries. They should be directed to 3ie’s Chair of the Board or another officer of 3ie. If all 3ie officers are implicated in the complaint, report or inquiry, it should be directed to Jacqueline A. Henson, Esq. (“Outside Legal Counsel”). 3ie will conduct a prompt, discreet, and objective review or investigation. Members, other volunteers and staff should recognize that 3ie may be unable to fully evaluate a vague or anonymous complaint, report or inquiry.

5. **Questions.** Questions related to the interpretation of this policy should be directed to the Chair of the Board or Legal Counsel.

6. **Publication.** 3ie will post this Policy on its intranet and include it in any employee policies and/or procedures manual.