



Whistleblowing Policy

Policy Owner	Global People
Policy Issuance	December 2019
Last updated	January 2025
Regions/Offices	Global
Contact Details	Anindita Singh, Senior Safeguarding Officer safeguardingconcerns@3ieimpact.org Culture and Ethics committee cec@3ieimpact.org

New Delhi

Unit no. 501A, 5th Floor, Rectangle-1
D-4, Saket District Centre
New Delhi - 110017, India

3ie@3ieimpact.org
Tel: +91 11 4110 2159

London

1 Poultry London
EC2R 8EJ
United Kingdom

3ieuk@3ieimpact.org
Tel: +44 20 3695 7895

Washington, DC

1111 19th Street, NW, Suite 700
Washington, DC 20036
United States of America

3ieus@3ieimpact.org
Tel: +1 202 629 3939

Contents

1. Introduction	3
2. Definition and scope of policy	3
3. Safeguards.....	3
3.1 Protection.....	3
3.2 Confidentiality	4
4. Reporting procedure	4
4.1.1 Public disclosures	4
4.1.2 Anonymous disclosures	4
4.2 Investigation.....	4
4.3 Escalation	5
4.4 Reporting to external authorities	5
5. Untrue and false allegations	5
6. Support for persons making a qualifying disclosure	5

1. Introduction

3ie is committed to the highest standards of accountability and transparency. This policy is intended to assist individuals who believe they have discovered serious malpractice or wrongdoing within the organization to voice concerns responsibly and effectively. It outlines the process for raising concerns internally, without fear of reprisal, and sets out how those concerns will be dealt with.

2. Definition and scope of policy

This policy applies to all employees and associates of the organisation. Other individuals performing functions in relation to 3ie work, such as agency individuals, contractors or suppliers, are also encouraged to use it.

In most jurisdictions, the law provides protection for individuals who raise legitimate concerns about specified matters. They are called qualifying disclosures. A qualifying disclosure is one made in the public interest by an individual who has a reasonable belief that any of the following instances is being, has been, or is likely to be, committed:

- a criminal offence.
- a miscarriage of justice.
- an act creating risk to health and safety, including concerns about harassment.
- an act causing serious damage to the environment.
- An act causing significant or substantial danger to public health and safety.
- a breach of any other legal obligation (other than employment contract).
- gross mismanagement or waste of funds.
- abuse of authority related to an award.
- concealment of any of the above.

This procedure is for disclosures about matters other than a breach of an employee's own contract of employment. If an employee is concerned that his or her own contract has been, or is likely to be, broken, they should use 3ie's grievance procedure. Personal grievances (for example bullying, harassment, discrimination) are not covered by whistleblowing law, unless the particular case is in the public interest. These should be reported under the respective policy under the safeguarding pillar, such as the Respect at Workplace policy, Anti sexual harassment policy.

3. Safeguards

3.1 Protection

This policy offers protection to 3ie employees and those affiliated with 3ie who disclose such concerns, provided the disclosure is made in good faith. The person making the disclosure must have a reasonable belief that what they are disclosing tends to show malpractice or impropriety and make the disclosure to an appropriate person (see reporting procedures below). The person raising the concern will be protected from being victimised in any way, intimidated or subject to any explicit or implied threat of retaliation. Retaliation, direct or indirect, including reassignment, unwarranted performance reviews, or exclusion from future opportunities, is strictly prohibited and will result in disciplinary action. Any false or malicious allegations may potentially give rise to legal action against the complainant by the person/s who is the subject of the complaint.

3.2 Confidentiality

3ie will take all reasonable steps to ensure that all disclosures are dealt with in a confidential and sensitive manner and that those making the allegations are not disadvantaged in any way by doing so. The identity of the individual making the allegation will be kept confidential so long as it does not hinder any investigation. However, the investigation process may reveal the source of the information, on a need-to-know basis, and the individual making the disclosure may need to provide a statement as part of the evidence required as part of such an investigation.

4. Reporting procedure

4.1.1 Public disclosures

When an individual or a 3ie employee has reasonable belief of a wrongdoing and wishes to raise a concern, they must raise the concern with their line manager, unless the individual reasonably believes that their line manager may be involved.

If the line manager is implicated or the individual making the disclosure does not wish to approach them, the concern should be reported to the Global People Senior Manager/ Senior Safeguarding Officer or the director of that unit.

The disclosure must be made using the [Whistleblowing Reporting form](#)

4.1.2 Anonymous disclosures

Employees, contractors, and third parties who wish to report a concern under this Whistleblowing Policy have the right to do so anonymously. 3ie recognizes the importance of confidentiality in encouraging the reporting of unethical or illegal conduct, and every reasonable effort will be made to protect the anonymity of whistleblowers. Any documentation, communication, or records relating to the whistleblower's report will be handled with strict confidentiality, ensuring that identifying information is not disclosed unless required by law. However, whistleblowers must be aware that while 3ie strives to maintain anonymity, it may be difficult to fully investigate certain complaints without knowing the identity of the whistleblower. In such cases, the whistleblower may be encouraged to disclose their identity to facilitate a thorough investigation, but such disclosure will remain voluntary.

4.2 Investigation

The Executive Director or Senior Safeguarding Officer or any other employee within 3ie who receives a whistleblowing disclosure must acknowledge receipt of the same within seven working days. All disclosures will be properly investigated by 3ie's Culture and Ethics

Committee, or if needed a special committee set up by the 3ie leadership. The Committee will conduct a thorough investigation and submit its report to the Executive Director within a thirty (30) working days' timeframe. The 3ie senior management will initiate the appropriate corrective action warranted by the outcome of the investigation.

In cases where disciplinary action is required, the Committee that carried out the investigation will report the matter to the Global People Deputy Director and Senior Manager, who will be responsible for initiating the disciplinary procedure and corrective action.

The complainant whistleblower may be notified of the outcome of an investigation when it is possible to do so.

4.3 Escalation

If the individual complainant believes that the investigation is compromised (e.g., the investigating officer is implicated, is implicitly covering up, or has failed to make a proper investigation or and report outcomes of the investigations), they may escalate the concern directly to their director, executive director, or the board chair.

4.4 Reporting to external authorities

If on the conclusion of steps outlined under 4.1, 4.2 and 4.3, the complainant has reasonable grounds to believe that appropriate action has not been taken, they may report the matter to the relevant statutory authorities in the appropriate jurisdiction, based on the subject matter of the complaint. If the complaint involves criminal acts, and the investigating committee fails to report the same to the police authorities, the complainant may also consider filing a complaint with respect to the qualifying disclosure made by them.

5. Untrue and false allegations

If a complainant makes an allegation in good faith supported by satisfactory evidence, which is not confirmed by subsequent investigation, no action will be taken against that individual provided that such individual is able to establish that due care was exercised by them to ensure the accuracy of the information.

Malicious allegations refer to complaints made with the deliberate intention to harm another individual or the organization. Malicious or deliberate false allegations will lead to disciplinary action, including but not limited to termination of employment.

6. Support for persons making a qualifying disclosure

3ie will take all the necessary and reasonable measures to provide support to those who raise concerns, including guidance, counseling or legal advice if necessary. In addition to guidance and counseling, interim measures such as temporary transfer, paid leave, or other accommodations may be made available to ensure the whistleblower's safety and mental well-being during the investigation.

7. Training and Awareness

3ie will ensure all employees are aware of the policy and their rights under it. Regular and relevant training will be provided to the members of the Culture and Ethics committee, to ensure effective enforcement. All training on this policy will include an explicit focus on the prohibition of retaliation against whistleblowers, ensuring that management and investigative personnel are aware of their responsibilities in protecting employees

8. Monitoring and Policy Review

Concerns and complaints raised through Whistleblowing will be tracked and monitored by the Senior Safeguarding Officer. Reporting of complaints under this policy will be part of the safeguarding reporting done on a quarterly basis to the senior management team and part of the consolidated safeguarding reporting at 3ie Board meeting.

This policy will be reviewed every two years, unless required earlier, to ensure its effectiveness and compliance with legal standards.
