

GiveWell UK Whistleblower Policy

Objective

The purpose of this policy is to provide all trustees and staff with guidelines for reporting suspected wrongdoing or dangers in relation to our activities.

Glossary

- **Whistleblower:** a trustee, staff, vendor representative, professional service provider, or other person affiliated with GiveWell UK who reports observed or perceived unethical or illegal behavior by or on behalf of GiveWell UK to GiveWell UK.
- **GiveWell UK persons:** all GiveWell UK trustees, staff (if any), officers, consultants, contractors, volunteers, casual workers, and agency workers.

Scope

This policy applies to all GiveWell UK persons.

This policy does not form part of any employee's contract of employment and it may be amended by the trustees at any time.

If you are uncertain whether something is within the scope of this policy you should seek advice from the designated point of contact whose details are at the end of this policy.

Terms

GiveWell UK is committed to lawful and ethical behavior in all of its activities and requires all GiveWell UK persons to conduct themselves in a manner that complies with all applicable laws and regulations. GiveWell UK further requires all trustees and employees to observe high standards of business and personal ethics in the conduct of their duties and responsibilities.

How to raise a concern

If at any time a GiveWell UK person has a concern regarding the propriety, safety, or legality of any action contemplated to be taken or that has been taken by GiveWell UK or any GiveWell UK person, or believes that action needs to be taken for GiveWell UK to be in compliance with law or appropriate ethical standards, the GiveWell UK person should first consider whether it can be reported to their manager (if any).

If not, then a report should be made to the designated point of contact at UKwhistleblowing@givewell.org. If the designated point of contact does not respond within a reasonable period of time, the GiveWell UK person should contact one of the trustees to report their concerns.

Confidentiality

We hope that GiveWell UK persons will feel able to voice whistleblowing concerns openly under this policy. Completely anonymous disclosures are difficult to investigate. If you want to raise your concern confidentially, we will make every effort to keep your identity secret and only reveal it where necessary to those involved in investigating your concern.

Investigation

Once you have raised a concern, we will carry out an initial assessment to determine the scope of any investigation. We will inform you of the outcome of our assessment. You may be required to attend additional meetings in order to provide further information.

In some cases we may appoint an investigator or team of investigators including staff with relevant experience of investigations or specialist knowledge of the subject matter.

The investigator(s) may make recommendations for change to enable us to minimise the risk of future wrongdoing.

We will aim to keep you informed of the progress of the investigation and its likely timescale. However, sometimes the need for confidentiality may prevent us giving you specific details of the investigation or any disciplinary action taken as a result. You should treat any information about the investigation as confidential.

External disclosures

The aim of this policy is to provide an internal mechanism for reporting, investigating, and remedying any wrongdoing in the workplace. In most cases, after going through the internal mechanism, you may find it is not necessary to alert anyone externally.

The law recognises that in some circumstances it may be appropriate for you to report your concerns to an external body such as a regulator. We strongly encourage you to seek independent advice before reporting a concern to anyone external, to avoid unintentionally making inappropriate external disclosures. Protect operates a confidential helpline. Their contact details are at the end of this policy.

Protection and support for whistleblowers

We aim to encourage openness and will support whistleblowers who raise genuine concerns under this policy, even if they turn out to be mistaken.

Whistleblowers must not suffer any detrimental treatment as a result of raising a genuine concern. If you believe that you have suffered any such treatment, you should inform the point of contact immediately.

You must not threaten or retaliate against whistleblowers in any way. If you are involved in such conduct you may be subject to disciplinary action. In some cases the whistleblower could have a right to sue you personally for compensation in an employment tribunal.

However, if we conclude that a whistleblower has made false allegations maliciously or with a view to personal gain, the whistleblower may be subject to disciplinary action.

Effective Date

February 8, 2022

Additional Resources

- GiveWell UK's policy on accepting gifts is [here](#).
- GiveWell UK's policy on conflicts of interest is [here](#).
- PROTECT (Independent whistleblowing charity)
Contact information:
 - Helpline: 020 3117 2520

- E-mail: <https://protect-advice.org.uk/contact-protect-advice-line/>
- Website: <https://protect-advice.org.uk/>

Point of Contact

Contact: Elie Hassenfeld, Trustee

Email: UKwhistleblowing@givewell.org

*Note that both Elie Hassenfeld and Whitney Shinkle (a designated authority) have access to this email address.

Address: % Bates Wells, First Floor, 10 Queen Street Place, London, EC4R 1BE

ACKNOWLEDGMENT OF RECEIPT

RE: WHISTLEBLOWER POLICY

I _____ (print full name) hereby acknowledge the receipt of the GiveWell UK Whistleblower Policy and realize that it is my responsibility to read it in detail so that I clearly understand the material.

Printed Name _____

Date _____

Signature _____