



Independent observer  
of the Global Fund

## Burkina Faso under additional Global Fund safeguards: Who's going to be next?!

### Context

In December 2022, Burkina Faso's Minister of Health and Public Hygiene received a message from the Global Fund's Grants Management Division explaining that the Global Fund had decided to invoke the Additional Safeguard Policy (ASP) with respect to its investment portfolio starting in 2023. The reasons given by the Global Fund to justify this are closely linked to the security and socio-political context that has prevailed in the country for several months. "The risk index for Burkina Faso," the Global Fund writes, "has been judged to be very high and corresponds to the category of countries with a difficult intervention context".

In concrete terms, the Global Fund considers that the safeguarding of its investments and the continuity of its programs are no longer guaranteed. "The difficulties of access to several areas of the country affecting the distribution of health care and health products, the challenges related to the distribution of mosquito nets in the framework of the mass campaign, the closure and minimal functioning of several health facilities thus depriving a large part of the population of health care" are some of the arguments used by the Global Fund to justify its decision.

### The consequences of invoking the ASP

It should be noted that invoking the ASP gives the Global Fund a number of important prerogatives. Indeed, the letter to the Minister of Health states that:

" 1. The Global Fund Secretariat will work with the Ministry of Health and the renewed CCM, Principal

Recipients, programs and Partners to identify and contract with relevant humanitarian, international and local organizations (through a service delivery contract) to ensure implementation of activities in security-challenged areas during the remaining period of implementation of current grants; that is, until the end of December 2023.

2. The Global Fund Secretariat may, through Principal Recipients, explore and contract with international and local humanitarian organizations (if possible) as service providers to ensure health care and commodity coverage for displaced persons in the different regions of the country.

3. The Global Fund Secretariat will explore the possibility of contracting, if necessary, through Principal Recipients; with humanitarian NGOs and UN Agencies in the Logistics Cluster as well as relevant private entities, to support the safe distribution of health commodities to displaced or hard-to-reach populations.

4. The Global Fund Secretariat may disburse funds directly to Service Provider Organizations for the implementation of targeted activities under contract.

5. The Global Fund Secretariat will decide on an approach to selecting the Principal Recipient(s) for the 2023-2025 allocation period and will nominate or select the Principal Recipient(s) for the next grant implementation period, if necessary.”

The Global Fund Secretariat has also spoken out about the conditions that Burkina Faso will have to meet if it hopes to emerge from what clearly looks like a trusteeship. These conditions are as follows:

“1. An eligible CCM is installed, new members are fully integrated, and governance documents are renewed in accordance with Global Fund recommendations and the Global Fund CCM Policy.

2. The security situation in the country improves; the Global Fund LFA (Local Fund Agent) and Principal Recipients are able to travel for oversight and assurance activities in at least 75% of the country. The Global Fund will be able to assess security improvements using internationally recognized indicators (Global Peace Index, UNDSS, etc.).

3. Financial transactions can be conducted through financial institutions or electronic payments in at least 80% of the country.

4. Assurance that current risks (programmatic, health commodity management, financial, governance) have been adequately mitigated following assessment and evaluation by the Global Fund Secretariat.”

Some questions about the additional safeguards

While it is true that the reasons given by the Global Fund for placing Burkina Faso under the ASP are not without relevance, there are many questions and concerns that inevitably accompany such a decision.

As mentioned above, in order to lift the application of the ASP, the Secretariat requires that Burkina Faso be able to guarantee security over at least 75% of its territory. This condition raises questions in more than one respect. Indeed, it is clear that war, political instability and generalized insecurity are currently rampant in many countries that are currently in the news. Are they therefore under additional safeguard measures? Need we remind you that according to audits by the Office of the Inspector General (see the Fund’s investigations in the Democratic Republic of Congo, Nigeria, and Sudan), many partnerships entered into by the Global Fund Secretariat in countries under additional safeguards have had very mixed results?

Also, it should be noted that this policy is generally invoked following problems of misappropriation. However, to date no such accusation has been made against a Principal Recipient or Sub-Recipient in

Burkina Faso. Should the Global Fund's decision be seen as a precedent for others? Is Burkina Faso such a specific case that it would require an atypical application of the ASP? Will Burkina Faso manage to emancipate itself from the additional safeguard measures? This question is an important one given that few African countries have been able to revoke the ASP once it is in place. For example, the policy has been in place since 2003 in South Sudan (then part of Sudan), 2011 in Mauritania, 2012 in Guinea, and 2016 in Chad and Nigeria.

What is the impact of this measure on the Global Fund's reputation?

Recently, Nigerian civil society representatives told Aidspace that in 2020 they published articles that were highly critical of the Policy. Even more recently, Mauritanian civil society members wrote a letter to some of the Global Fund's partners and officials denouncing the implementation of the ASP currently in force in their country. This letter, which Aidspace has seen, complained about the Global Fund; it said that the ASP did not take into account the interests of key populations. For the Global Fund, who prides itself on advancing the rights and representation of key populations, these accusations are unwelcome.

Who really benefits from the ASP? How long can the Global Fund Board continue to ignore the complaints and recriminations of those African countries under the ASP? The Global Fund may be convinced that it is on the right track in every respect. But as the saying goes, "The road to hell is sometimes paved with good intentions". Isn't it time for the Global Fund to do some soul-searching on this issue? Isn't it time for a thorough review of this Policy (Under what conditions should it be applied? For how long? When and how should its application be revoked in a given context? etc.).

Wouldn't such an update be an excellent way to manage the reputational risks that this Policy poses to the Global Fund? Let's dare to open the debate.

[Read More](#)

---