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Global Fund Board Adopts New Whistle-Blowing Policy

List of reportable conduct significantly expanded

Global Fund stakeholders “have a duty” to inform the Office of the Inspector General (OIG) when they see what they believe to be evidence not only of theft and fraud, but also mismanagement and “inappropriate use of program assets” – according to a new policy on whistle-blowing adopted by the Board at its meeting in Geneva.

The new policy applies to all of the entities involved in Global Fund operations, including the Secretariat, and in-country players such as grant implementers, local fund agents (LFAs) and country coordinating mechanisms (CCMs).

Previously, there were two separate policies covering different parts of the above. For the most part, the new policy simply merges the two previous policies and updates some information. However, the types of “reportable conduct” were significantly expanded. Below is the list of types of reportable conduct in the new policy, with underscoring used to identify those types of reportable conduct that have been added – i.e., that were not present in the previous policies:

- theft or diversion of funds or other assets
- fraud
- knowingly communicating false information and inappropriate disclosure of information
- waste of resources, assets and monies (e.g., knowingly purchasing expired drugs, supplying faulty test kits)
- unethical conduct
- actions damaging the Global Fund’s reputation and which may lead to an investigation
- abuse of power or authority

- mismanagement
- inappropriate use of programme assets
- non-compliance with the Global Fund Procurement Policies
- maladministration (for example, failure to take proper action to rectify reported problems, failure to respond to complaints)
- conflict of interest
- product substitution and counterfeit drugs
- any breach of the Supplier Code of Conduct

The new policy includes stronger non-retaliation provisions to protect whistle-blowers who make a disclosure. For example, the policy states that any staff member of the Global Fund who is alleged to have retaliated against a person who has made a report to the OIG in good faith will be the subject of an OIG investigation. Should the allegation be substantiated, the staff member will face disciplinary action for gross misconduct.

There are two ways to report misconduct: (1) directly to the OIG; and (2) through a third-party reporting service. Detailed information on how to report misconduct is provided on the [Reporting Fraud or Abuse page](#) of the Global Fund website.

The new whistle-blowing policy and procedures are available on the [Policy Documents](#) page of the OIG section of the Global Fund website.

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