Anti-Fraud and Corruption

Self-Assessment

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| Part 1: Reporter details | |
| Organization:  Name, role (PR,  SR etc.), address |  |
| Date of review: |  |
| Reporter:  staff name |  |

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| 1. Fraud reporting – intake procedures |
| 1.1 Does your organization have a Whistle-Blower Policy?  Obtain a copy where possible; who is responsible for its implementation? Record details in Section 3. |
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| 1.2 How do employees report actual or potential fraud or corruption through routine business channels?  i.e. how are suspected incidents reported to management for action? |
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| 1.3 What whistle-blower reporting mechanisms are in place for employees wishing to report fraud or corruption anonymously, or in confidence?  i.e. hotline, email address, designated employee or Anti-Fraud and Corruption Focal Point. |
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| 1.4 Is there a single person or team responsible for receiving and assessing fraud and corruption reporting and/or whistle-blower allegations? If not, how is this administrated?  Job title(s), where possible job description(s), describe their activities and record full contact details  in Section 3. |
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| 1.5 What systems or processes are in place to record fraud and corruption allegations?  Describe workflow process, and system or software to administrate allegations. |
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| 1.6 How are allegations assessed and investigated?  i.e. what matters are recorded, what resolution options are in place, who investigates? |
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| 1.7 Is there a requirement for staff members to report fraud and corruption and how is this communicated?  i.e. contracts of employment, organization Code of Conduct and Ethics Policies, induction package, compliance activity, training, posters… |
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| **1.8 How does the organization ensure confidentiality of whistle-blowers, and protect them from retaliation?**  Are there Whistle-blower Protection Policy and Procedures? |
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| **1.9 What other anti-fraud and corruption measures does the organization have in place?**  i.e. strategies, policies, initiatives or examples of good practice. |
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| **1.10 Any other comments on fraud and corruption reporting, whistle-blowing, and intake procedures?** |
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| 1. Reporting of fraud and corruption to the Global Fund and external partners |
| 2.1 Who is responsible for decision-making and escalating reports of wrongdoing to the OIG or Global Fund Secretariat in Global Fund programs?  Record the person’s role, decision-making process and contact details in Section 3. |
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| **2.2 Has your organization ever escalated any reports of fraud and corruption to the OIG, Global Fund Secretariat or other donor or partner agencies?** |
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| 2.3 How were these issues escalated?  Via which channels and to whom? via LFA, CCM, OIG hotline, Country Team meetings, etc.? |
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| 2.4 If issues were not reported to the Global Fund or to other donors, why not, and what happened to resolve them?  Identify blockages to reporting, or lack of awareness, and internal fraud and corruption resolution methodology. |
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| 2.5 What internal investigations have taken place in this organization – that involved Global Fund programs and financing or other donor or partner agencies?  Obtain overview, or spreadsheet, or summaries of investigation action taken by organization. |
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| 2.6 Who is the national body responsible for anti-fraud and corruption enforcement in country?  Identify the competent authority in country. Record any contact details in Section 3. |
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| 2.7 Has your organization reported any fraud and corruption issues involving Global Fund programs or other donor or partner agencies to the national authority?  Obtain details of what and when reported, and outcomes. |
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| 2.8 Does your organization have any ‘active’ fraud and corruption investigations ongoing at this time? |
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| 2.9 Does your organization have any partnerships or information sharing agreements with other organizations?  Does the organization network with anti-fraud and corruption partners in-country or region? Do they participate in prevention activities or training? |
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| **2.10 Any other comments on the prevention and management of fraud and corruption?** |
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| 1. Anti-Fraud and Corruption Focal Points: contact details |
| Record all contact details, and roles & responsibilities of individuals engaged in fraud reporting, management and response duties. |
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