 Anti-Fraud and Corruption

Stakeholder Engagement Model\*

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| Stage | Action | Owner | Day |
| 1 | Anti-Fraud and Corruption Focal Point (FP) receives or identifies a report of fraud or corruption. | FP | 1 |
| 2 | FP ensures the Anti-Fraud and Corruption Reporting Template (Tool 5) is completed, and details registered in the Anti-Fraud and Corruption Incident Management Sheet (Tool 6). | FP | 1 |
| 3 | FP acknowledges receipt of the report with whistle-blower or business reporter and requests any further information necessary to make an initial assessment. | FP | 2 |
| 4 | FP conducts an initial review of the report and produces a written assessment with next step recommendations for his or her manager. | FP | 3 |
| 5 | FP Manager conducts a preliminary assessment of the report and secures any additional information necessary to support the allegation. The FP’s Manager escalates the report, with next step recommendations to the organization’s Executive Director (ED) and associated department heads (risk, ethics, compliance, legal etc.). | Manager | 4 |
| 6 | ED decides on further internal escalation or whether to inform National/International Office of Audit & Investigations. | ED | 5 |
| 7 | ED determines whether to inform external donors and partners. Where actual or potential wrongdoing is identified in Global Fund programs, the Global Fund Office of Inspector General (OIG) and Country Fund Portfolio Manager (FPM) must be jointly informed. Anti-Fraud and Corruption Reporting Template (Tool 5), associated preliminary assessment, and supporting documents should be submitted. An initial draft response plan should set out proposed initial fact-finding and risk mitigation actions. | ED | 5 |
| 8 | ED, with FP Manager, assesses response from the Global Fund OIG and has two options:   1. the OIG agrees to further internal fact-finding by the ED, with continued liaison with the OIG within proposed and agreed timelines; or 2. the OIG requires fact-finding activity to be suspended pending further assessment and liaison with OIG. | ED  &  FP Manager | 8 |
| 9 | If stage 8a: FP Manager and FP continue fact-finding and risk mitigation plan for internal action. Outcome of plan sent back to the Global Fund OIG. | FP Manager and FP | 30  days |
| 10 | If stage 8b: The OIG updates ED with proposed OIG solution (investigation or audit plan) | OIG | 30  days |
| 11 | If full OIG investigation, it may include joint investigation with the organization. Full investigation results published, or administrative closure shared with the organization. | OIG | 30  weeks |
| 12 | OIG investigation published in line with the Global Fund Policy for the Disclosure of Reports Issued by the Inspector General. | OIG | 30  weeks |

 \*Inspired by material from Catholic Relief Services