

# Global Fund Complaints Mechanism

How can people who use  
drugs use it effectively?



International  
Network of People  
who Use Drugs



The Global Fund invests more than US\$4 billion a year to support programmes in more than 100 low-and-middle-income countries and is committed to protecting and promoting human rights, including of key populations. It is therefore critical that corruption, fraud, human rights violations, mismanagement, and misuse of Global Fund funding are reported, investigated, and resolved.

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## 01 WHAT IS THE OFFICE OF THE INSPECTOR GENERAL AND WHY IS IT IMPORTANT?

The Global Fund invests more than US\$4 billion a year to support programmes in more than 100 low-and-middle-income countries and is committed to protecting and promoting human rights, including of key populations. It is therefore critical that corruption, fraud, human rights violations, mismanagement, and misuse of Global Fund funding are reported, investigated, and resolved. The Global Fund has charged the [Office of the Inspector General](#) (OIG) with the responsibility to investigate irregularities in programmes it supports and to provide effective complaints mechanisms for whistle-blowers to report all wrongdoings relating to Global Fund activities. The main objective of the mechanism is to ensure equal access to high quality services and programmes for all, and to provide communities with a secure communication channel to voice their concerns regarding alleged offences.

The OIG is independent of the Global Fund Secretariat. It reports directly to the Global Fund Board through its Audit and Finance Committee. This is to ensure transparency and objectivity of its work and to improve accountability of the Global Fund work at the national level and in the Secretariat.

The OIG's mandate is wider than investigations. It also includes internal audits, in-country reviews, inspections, and counter-fraud, among others. However, this guide focuses only on the investigation side of the OIG work and explains step by step how people who use drugs can use this mechanism effectively to report human right violations, fraud, corruption, and other wrongdoings. To learn more what the OIG understands as wrongdoings, read the **'What wrongdoings can you report?'** section below.

To encourage more people (whistle-blowers) to report any alleged wrongdoings and to promote the complaints mechanism, the OIG has launched the 'I Speak Out' campaign and e-learning platform. Visit their website [ispeak-outnow.org](https://ispeak-outnow.org) to learn about different types of wrongdoings, read case studies, and to file a complaint. You can also find tips and advice on how to do it effectively as outlined below.



Watch the ispeakout animation to find out more.

## 02 WHY SHOULD YOU REPORT?

The Global Fund is the largest donor for harm reduction in low-and middle-income countries, therefore ensuring effective implementation of high-quality harm reduction services and drug policy programmes is crucial to our health and rights.

By speaking out about alleged wrongdoings and irregularities, you will be able to influence how Global Fund money is spent, improve programming and quality of services, ensure that medicine and health products are reaching people who use drugs, advance meaningful participation of our community in Global Fund processes, and hold people/institutions accountable.

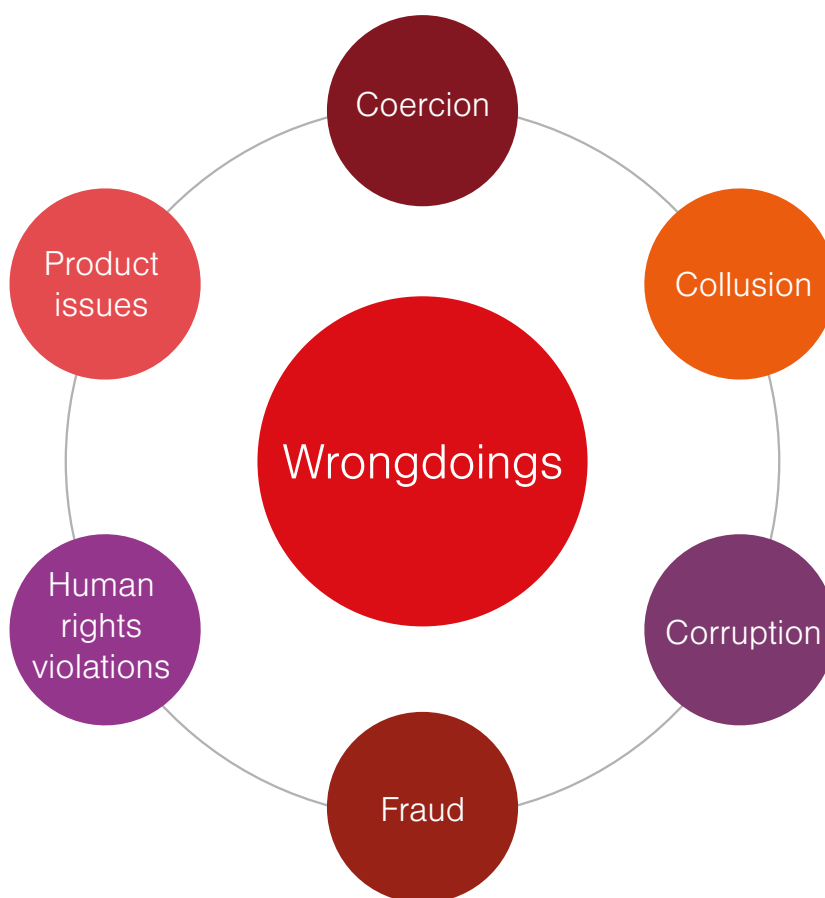
Remember, it is worth reporting any alleged wrongdoings early on as it can help to prevent small-scale irregularities from escalating into widespread corruption, human rights violations, or abuse.

A decorative graphic consisting of numerous circles of various sizes and colors (red, orange, purple, brown) scattered across the lower right portion of the page. A large red circle is prominent in the center of this cluster, containing text.

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### 03 WHAT WRONGDOINGS CAN YOU REPORT?

The OIG has a mandate to undertake investigations of alleged coercion, collusion, corruption, fraud, human rights violations, and product issues within Global Fund financed programmes and committed by Principal Recipients, Sub-Recipients, Country Coordinating Mechanisms, Local Fund Agents, and Sub-Sub Recipients, as well as contractors and suppliers, among others.



You can read a short description of each wrongdoing that the OIG can investigate, as outlined below.

### 3.1 Coercion

Coercion means using force or threats to get someone to do something that they would not otherwise do in order, for example, to hide the misuse of grant funds. Examples of coercion include:

- Forcing someone to engage in sexual activity in order to obtain/keep a job or receive allowances, medicine, or other free benefits
- Threatening to hurt someone unless given money
- Threatening to reveal non-public and confidential information about someone unless given money
- Threatening to fire someone/remove from a programme unless money is exchanged

### 3.2 Collusion

Collusion means a secret cooperation or agreement to mislead others, for example, to supply sub-standard medicines or to reduce fair competition and drive up the prices of medicines. Signs of collusion include:

- The same supplier wins multiple contracts
- Unexplained increases in product prices
- Decrease in product quality
- Qualified suppliers refrain from bidding

### 3.3 Corruption

Corruption simply means the abuse of power for private gain. Examples of corruption include:

- A health officer or service provider demands money for delivering services which are supposed to be free (e.g. OAT or ART treatment)
- A Sub-Recipient bribes the Principal Recipient to receive a contract
- A politician changes the law as a favour to their financial supporters

### 3.4 Fraud

Fraud means providing false or misleading information for personal gain. Examples of fraud include:

- Claiming travel expenses for a trip that they did not embark on
- Using a company credit card for personal purchases
- Providing false data or information
- Falsifying documents such as invoices, accounting records, or signatures
- Borrowing project money for personal use
- Using project equipment and supplies for personal use

### 3.5 Human rights violations

All Global Fund grant agreements list five human rights standards that all grant recipients must meet. Under the grant agreement, Global Fund grant recipients are required to let the Global Fund know if there is a risk that programmes they plan to run may violate any of the standards. They may be asked to work with the Global Fund and address the risks with specific actions.

**All Global Fund financed programmes are expected to meet the following five human rights standards:**

- a. To grant **non-discriminatory access** to services for all, including people in detention. Example of violation: a woman is refused ART treatment because she uses drugs and because of that she is deemed not able to adhere to treatment.
- b. To use only **scientifically sound and approved medicines or medical practices**. Example of violation: people who use drugs are given an experimental treatment and are not told that the treatment has never been approved by either the national regulatory drug authority or WHO.
- c. To not employ methods that constitute **torture or that are cruel, inhumane, or degrading**. Example of violation: people who use drugs are sent to compulsory drug detention centres, which UN agencies and the Global Fund have condemned as ineffective and a violation of human rights.
- d. To **respect and protect informed consent, confidentiality and the right to privacy** concerning medical testing, treatment or health services received. Example of violation: A health care worker reveals to an employer of a client that the employee receives opioid agonist therapy.
- e. To **avoid medical detention and involuntary isolation**, which are to be used only as a last resort. Example of violation: A person who uses drugs is detained or held against their will in a health centre or hospital and deemed to 'lack capacity' based on the status of drug use and dependency alone.

### 3.6 Product issues

This simply means stealing, diverting, or counterfeiting health products. Examples of product issues include:

- Medicines and health products with words such as 'Not for Retail Sale' or other logos are available for sale in private pharmacies and markets
- People steal small quantities of medicines from local health facilities
- Medicines given by a health worker have limited or no effects as they were swapped for a lesser quality medicine



To learn more about the six wrongdoings including how to spot them and what effect they have on the Global Fund programming, visit the [ispeakoutnow.org](https://ispeakoutnow.org) platform and click on eLessons. Each eLesson takes five minutes and you can quiz your knowledge about different types of wrongdoings at the end of the session.

### 3.7 Examples of what you should report:

- Stealing money or medicine
- Use of programme funds for personal use
- Fake invoicing
- Staging of fake training events
- Counterfeiting drugs
- Irregularities in tender processes (for example, fraudulent bids, bid collusion, bid manipulation, coercive practices in bidding)
- Fraud against the Global Fund or its grant recipients (for example bribery, kickbacks, inappropriate gratuities, forged signatures, false travel claims, travel with no legitimate purpose)
- Abuse of power or authority for personal gain
- Conflict of interest
- Human rights violations by Global Fund grant recipients
- Theft or diversion of funds or other assets (including embezzlement, theft of assets procured with grant funds etc.).

This list does not cover everything, so do not hesitate to contact the Office of the Inspector General or INPUD if you are unsure what is an eligible issue to report. Please consult the list of key contacts at the end of this guide.

Remember, the OIG can only investigate wrongdoings that are linked to the Global Fund money and are related to the wrongdoings described above. Alleged wrongdoings, including human rights violations, that are conducted by other agencies that are not Global Fund implementers cannot be investigated by the OIG.

To report programmatic problems, stock-outs, concerns about Country Coordinating Mechanisms, issues with selection of grant recipients, or other concerns not related to wrongdoings, contact the Fund Portfolio Manager in your country.

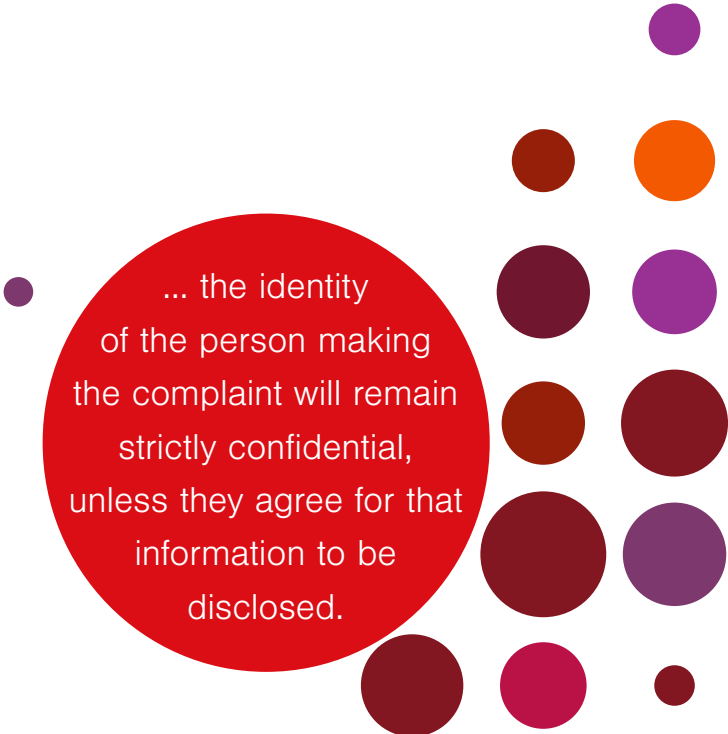


## 04 WHO CAN FILE A COMPLAINT?

If you or your organisation have witnessed, experienced, or heard of the Global Fund Principal Recipient, Sub-Recipient or Sub-Sub Recipient doing any of the six wrongdoings described above, you can file a complaint with the OIG.

An organisation can file a complaint on behalf of an individual or group that is directly affected but will have to provide a letter of authorisation.

Remember, the identity of the person making the complaint will remain strictly confidential, unless they agree for that information to be disclosed. Anyone reporting a wrongdoing can also choose to remain anonymous.



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## 05 TIPS ON PLANNING YOUR COMPLAINT AND WHAT INFORMATION TO INCLUDE

### 5.1 Get informed

- Learn more about the wrongdoings by watching short videos, taking eLessons, and reading different case studies on the [ispeakoutnow.org](https://ispeakoutnow.org) platform. All information is available in English, French, Spanish, and Russian.
- Watch INPUD's webinar on Global Fund Complaints Mechanism: How people who use drugs can use it effectively. You can access it [here](#).
- You can also request a Short-Term Technical Assistance from the Global Fund to learn more about how the complaints mechanism work and learn how to file a complaint. Read INPUD's [Global Fund's Short-Term Technical Assistance](#) guide to find out more.

### 5.2 Decide which alleged wrongdoing you want to report

- When writing up a report, it will be good to be as specific as possible about the wrongdoing you are reporting on. This will help the OIG with the review of the complaint and speed up the process.
- If you are unsure which wrongdoing your complaint is linked to, contact INPUD or the OIG for advice. You can find a list of key contacts at the end of this guide.

### 5.3 Gather information and evidence

- Make your report as specific and complete as possible. Use the following questions as a guide:
  - What is the type of wrongdoing you are reporting?
  - Where and when did it take place?
  - How long do you think this problem has been going for?
  - What happened exactly?
  - How did you become aware of the wrongdoing?
  - Are those responsible for grant management aware of this problem?
  - Who was involved and who else knows?
  - Did anyone try to hide the wrongdoing and if yes, what did they do?
  - Why do you think it should be investigated?
  - Do you have any other relevant information?
- Check out the reporting template in Annex 1 to learn more about how to write a complaint.
- Do not worry if you cannot provide all details as described above and in Annex 1. Contact INPUD or the OIG for advice on how to proceed.
- Save copies of documents and evidence that support your complaint.

#### 5.4 Consult with your community and INPUD

- If the alleged wrongdoing was not committed by anyone from the community and the community is aware of the problem, organise a meeting to gather more evidence and information and to decide on next steps together.
- If you have any questions or need advice, contact INPUD or your regional network.

#### 5.5 Draft the complaint and decide who will submit it

- Write the first draft of the complaint in collaboration with your organisation or the community. Remember, if an organisation is filing a complaint on behalf of an individual or a group, they will need a letter of authorisation in order to do so.
- Agree on who (an individual or an organisation) will submit the complaint.

#### 5.6 Put the safety of yourself and the community first!

- Only file a complaint once you (or your organisation or the community) have decided that it is safe to do so.
- The OIG guarantees protection of the whistle-blower identity. Allegations shared with the OIG can be made confidentially (in which case your identity will be known only to the OIG and will not be disclosed unless you give your explicit consent) or anonymously (in which case no one, not even the OIG, will know your identity).
- However, if you decide to submit the complaint anonymously, the OIG will not be able to contact you for further information or for clarifications. As such, it can sometimes make it difficult to investigate your complaint further. Therefore, if you submit your allegation anonymously, provide as much detail as possible to enable the investigator to follow up on information that may be needed to pursue the investigation, and include any supporting documentation.

#### 5.7 Choose the best way to submit your complaint

There are five ways in which you can submit your complaint:

Using the **secure and confidential online reporting form**, which you can access [here](#).

- This service is operated by a third company, Navex. It is available in four languages: English, Spanish, Russian, and French.
- This service will provide the details of your report to the OIG. It will ask if you want to stay anonymous or if you want to provide your contact information confidentially.
- If you provide your contact information, the OIG will contact you directly for more information within a week.
- If you choose to stay anonymous, Navex will provide you with a unique code called a 'report key'. Write down your report key and password and keep them in a safe place. After five to six business days, use your report key and password to check your report for

feedback or questions. You will be able to access your complaint [here](#).

- Remember, if you chose to stay anonymous, Navex will not have your contact information. As such, any further contact will need to be initiated by you.

#### Calling a **Free Telephone Reporting Service on +1 704 541 6918**

- This service is also operated by the reporting company Navex and is available in English, French, Spanish, Russian, Chinese, and Arabic. An interpreter will be arranged while you are on the line.
- This service operates on the same basis as the online reporting form, and you will be provided with a 'report key'.

#### Leaving a **secure voicemail by calling +41 22 341 5258 number**

- This is a secure direct line to the OIG and operates 24/7.
- You can choose to use this service anonymously. If you do, remember that the OIG will not be able to contact you back. If that is the case, please provide as much detail and information on the alleged wrongdoing as possible.

#### Sending an **email to [hotline@theglobalfund.org](mailto:hotline@theglobalfund.org)**

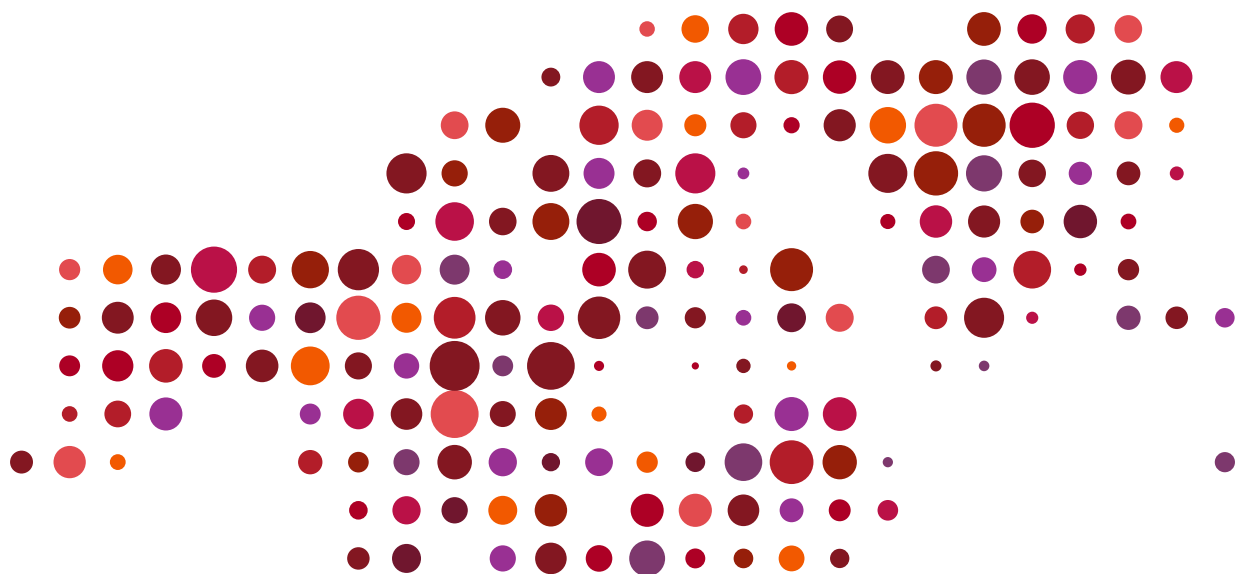
- Again, you can choose to stay anonymous by using an email address that does not reveal your identity, or you can ask for your email to be treated confidentially. In that case, the OIG will not reveal your identity unless you give them a permission to do so.
- You can also choose to CC other people in your email as long as it does not impact their safety, and they are aware that they will be CCed in the email.

#### Sending a letter to **I Speak Out Now!, Office of the Inspector General, Global Fund, Chemin du Pommier 40, CH-1218 Le Grand-Saconnex, Switzerland**

- As with the other options, you can send the letter anonymously or ask for it to be treated in a confidential way.

## 5.8 Submit the complaint

- Once you have decided which method of contact you want to use, submit your complaint.



## 06 WHAT HAPPENS NEXT?

When the OIG receives a complaint, it will respond to you within a week and will log the complaint in their system. Next, the information you provided will be carefully assessed to identify the severity of the allegations, and a decision will be made whether to further investigate the complaint or not. You will receive follow-up information within a month.

If your complaint becomes an investigation, the OIG will follow international investigation guidelines which include interviewing witnesses, collecting relevant documents, and gathering other types of evidence. The investigation process will follow established timelines and will take around 30 weeks. Look at the table below to learn more about each stage of the investigation.

If it is decided that your complaint (specifically about human rights violations) should be investigated but it is not possible for the OIG to do so for logistical or security reasons, the Inspector General can decide, with your consent, to share the information with relevant United Nations human rights bodies.

If the OIG decides not to investigate your complaint because it is not in their remit (e.g. it is about programmatic aspect rather than about a wrongdoing), the matter will be referred to Community Rights and Gender team or another Global Fund department to follow up.

All full investigation reports are published on the [Global Fund website](#) in the interests of transparency and accountability. Lastly, the person who filed the original complaint will also be updated on the outcome.



## 07 OIG INVESTIGATIONS PROCESS

Total Time 30 weeks (Not including Stage 1)	OIG	Secretariat	In country
<b>Stage 1</b> Allegations intake and Screening  Up to a week	The screening process checks if submitted allegation (complaint) is within the OIG mandate, if it is specific, and verifiable.	When necessary, Country Team or technical experts may be contacted directly for more information.	When necessary, Local Fund Agents, Country Coordinating Mechanisms, and whistle-blowers may be contacted directly for more information.
↓			
<b>Stage 2</b> Assessment, research, and planning  Weeks 1-4	Initial desk-based research is undertaken resulting in Investigation Plan.	When appropriate, advance notice is given to the Country Team of upcoming missions.	When appropriate, advance notice is given to Country Coordinating Mechanisms, grant implementers, and Local Fund Agents of upcoming mission.
Safeguard: Head of Investigations signs off on Investigation Plan (1 week)			
↓			
<b>Stage 3</b> Investigation  Weeks 5-11	Investigation of allegations.	Country Team is notified if there is substantive evidence of wrongdoing.	Implementers and suppliers collaborate with the OIG regarding access to records, premises, and meetings with employees.
Safeguard: Secretariat notified of preliminary findings to mitigate immediate risk			
↓			
<b>Stage 4</b> a. Closure by Case Closure Memo  Weeks 12-17	Allegation will be closed by Case Closure Memo if investigation shows: <ul style="list-style-type: none"> <li>• Allegation is unfounded</li> <li>• Evidence is inconclusive</li> <li>• Further intervention by the OIG would be disproportionate i.e., risk has been mitigated.</li> </ul>	Case Closure Memo can lead to agreed actions with the Secretariat.	Whistle-blower informed if case is closed.
Safeguard: Head of Investigations signs off on Case Closure Memo (1 week) Safeguard: Aggregated Case Closure Memo data are reported to Audit Committee and Board			

OR

b. Drafting and review of findings for report	The OIG discusses findings and potential root causes with relevant senior Secretariat management.	Secretariat provides strategic information to the OIG as needed.	
Weeks 12-17	Discussion on Agreed Management Actions starts.	Secretariat proposes Agreed Management Actions addressing the root causes.	
	Letter of findings is sent.		
	Safeguard: Review by Team Leader and Head of Investigations (1 week) and 72 hours heads up for Secretariat		



<b>Stage 5</b>	Investigation findings are sent out to subjects in country.	Secretariat may provide comments on relevant findings.	Implementer may provide comments on relevant findings.
Facts and accuracy check			
Weeks 18-19		Draft Agreed Management Actions are completed.	



<b>Stage 6</b>	Draft report is written.	Secretariat finalises Agreed Management Actions.	
Report consolidation			
Weeks 20-24			
	Safeguard: Head of Investigations signs off on draft report (1 week) and 72 hours heads up for Secretariat		



<b>Stage 7</b>	Draft report is sent to Secretariat and Country Coordinating Mechanism / Implementer.	Secretariat has 2 weeks to review full report with finalised Agreed Management.	Country Coordinating Mechanism has 2 weeks to review draft report with finalised Agreed Management Actions for context, tone, and balance.
Checking context, tone and balance		Actions for context, tone, and balance ready within 2 weeks.	
Weeks 25-27			
	Safeguard: Head of Investigations and Inspector General sign off on final report (1 week)		



<b>Stage 8</b> Report finalised  Weeks 28-30	The OIG finalises the final report	Management Executive Committee receives the final report and has 1 week to provide feedback (in parallel with audit committee) which is considered by the OIG.	
	Final outcome: Audit Committee reviews final report (1 week) Final outcome: Board receives report 1 week before publication		



<b>Stage 9</b> Agreed Management Actions and tracking  Ongoing	Agreed Management Actions tracked and impact analysed.	Sanctions process followed if relevant.	Referrals to National Authorities and anti-corruption bodies when necessary.
			Whistle-blower informed that case is now closed and report is published.



## 08 KEY CONTACTS

Global Fund, Office of Inspector General: [hotline@theglobalfund.org](mailto:hotline@theglobalfund.org)

INPUD, Gayane Arustamyan: [gayanearustamyan@inpud.net](mailto:gayanearustamyan@inpud.net)

INPUD, Judy Chang: [judychang@inpud.net](mailto:judychang@inpud.net)

INPUD, Olga Szubert: [olgaszubert@inpud.net](mailto:olgaszubert@inpud.net)



## ANNEX 1 GLOBAL FUND COMPLAINTS MECHANISM – EXEMPLARY REPORTING TEMPLATE

The below reporting template has been designed based on the OIG's online reporting form. It can be adopted to send an email or prepare a letter as well as gather key information for a call or to leave a voice mail.

Part 1: Your details	
Your name: (Optional)	
Position title: (Optional)	
Email address: (Optional)	
Telephone number: (Optional)	

If you want to submit a complaint anonymously, you don't have to provide your details. However, ensure that the OIG can contact you if they require more information. This can be done by using an email address that does not reveal your personal information. Remember, the OIG guarantees protection of the whistle-blower identity.

Part 2: Wrongdoing type
What is the type of wrongdoing that you are reporting?
<input type="checkbox"/> Corruption
<input type="checkbox"/> Fraud
<input type="checkbox"/> Coercion
<input type="checkbox"/> Collusion
<input type="checkbox"/> Non-compliance with Laws/Global Fund Grant Agreements
<input type="checkbox"/> Human rights violations
<input type="checkbox"/> Product issues
<input type="checkbox"/> Other/Not sure
Description:

Read the **What wrongdoings can you report?** part of this guide to learn more or visit the [ispeakoutnow.org](https://ispeakoutnow.org) website for more information.

**Part 3: Identity of the person(s) engaged in the wrongdoing**

If possible, please provide identity (name, surname, and title) of people engaged in the alleged wrongdoing. If you do not know their details, you can write: unknown. For example, John Smith - Director or Jane Unknown - Supervisor, or Unknown Unknown - OAT Clinic Manager.

Additionally, if you know, add if management of the person(s) engaged in the alleged wrongdoing is involved or aware of the situation or tried to cover up the alleged wrongdoing. When possible, provide their details too (name, surname, and title).

Remember, any person mentioned by you will be restricted by the OIG from accessing information reported by you.

**Part 4: Estimate monetary value of the wrongdoing**

If possible, please provide the monetary value of the wrongdoing. It does not have to be specific, an estimate will be sufficient. For example, USD 50,000 - USD 99,999. You can also report the value in your own currency.

**Part 5: When did the alleged wrongdoing happen?**

Provide specific, or if not possible, approximate date of the alleged wrongdoing happening. If it occurred more than once, provide all dates. For example, 25 June 2021 or two weeks ago, or between September and December 2021. Also add information on how long do you think this problem has been going on (for example, it happened only once, for a month or for more than a year).

**Part 6: Where did the alleged wrongdoing take place?**

If possible, provide the exact address where the alleged wrongdoing took place. If not possible, provide as much detail as you can. In some cases (e.g. fake invoicing or fake travel claims), there might not be an exact physical place. In this situation, indicate if the alleged wrongdoing was observed in invoicing, an email, or another document.

**Part 7: How did you become aware of the alleged wrongdoing?**

Briefly describe how you became aware of the situation. For example, "it happened to me"; "I overheard it"; "I came across a document or a I was told about it by a colleague".

**Part 8: Detailed description of the alleged wrongdoing**

In this part, be as specific and detailed as possible about the alleged wrongdoing, including the locations of witnesses and any other information that could be valuable in the investigation. At the same time, be careful not to reveal your personal details if you are the only person aware of the situation and your safety might be at risk, or if you wish to stay anonymous.

**Part 9: Supporting documents**

If you are submitting your complaint via email or the online form, attach any documents that support your complaint and might be useful for the investigation. The online form offers 100 MB of disk space for uploading your documents.



The International Network of People who Use Drugs (INPUD) is a global peer-based organisation that seeks to promote the health and defend the rights of people who use drugs. As an organisation, INPUD is focused on exposing and challenging stigma, discrimination, and the criminalisation of people who use drugs, and their impact on the drug-using community's health and rights. INPUD works to achieve its key aims and objectives through processes of empowerment and advocacy at the international level; and by supporting empowerment and advocacy at community, national, and regional levels. [www.inpud.net](http://www.inpud.net)

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International  
Network of People  
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