

# My Code My Responsibility

Code of Ethical Conduct for Country Coordinating Mechanism  
Members

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## Country Coordinating Mechanism Members' Duties

This Code of Conduct outlines how individual CCM Members (including Regional Coordinating Mechanisms, Alternates, and CCM Secretariat employees) should perform their duties, which are outlined in the Guidelines and Requirements for CCMs and internal CCM policies. CCM Members are **required** to:

- Read, be familiar and comply with this Code
- Certify, upon the Global Fund's request, commitment to act in line with this Code in their roles as CCM Members
- Act ethically and as positive role models in the context of their membership on the CCM
- Support anyone who raises concerns about violations of this Code or the CCM Guidelines
- Raise questions and concerns if they become aware of possible violations of CCM Guidelines, CCM Policies, this Code, or any integrity-related laws.

**This Code of Conduct expects CCM Members to:**

- **Act consistently with their duty of care**
- **Act accountably**
- **Act with integrity**
- **Act with dignity & respect**
- **Speak out**

### CCM Chair, Executive & Ethics Committee Responsibilities

- Encourage CCM Members to know the Code and all other governing documents: (CCM Guidelines, CCM Conflict of Interest Policy and CCM Bylaws)
- Ensure that CCM members receive the Code and the CCM Conflict of Interest Policy, read them, and ensure the policies' enforcement consistently and fairly
- Make sure no one is punished or hurt for raising Code-related concerns or questions
- Create a respectful and inclusive CCM environment with active and effective contributions by all members and with transparent and equitable decision-making

### CCM Secretariat Employees

CCM employees are **required** to provide timely, professional, and transparent support to all members of the CCM, including responsible management of information, budgets, and CCM meeting minutes.

If CCM Members have a question about how to abide by this Code, or if they have a concern or suspicion that others may not be abiding by this Code, they are **required** to actively uphold the Code by speaking out:

- Where possible, raising the matter within the CCM.
- In parallel, alerting the Global Fund.

The Global Fund will not tolerate any form of retaliation against those who act consistently with this Code and speak out.

## The CCM – A Unique Forum for Advancing Public Health

CCMs are mechanisms for public-private partnership in the governance of HIV, Tuberculosis, and Malaria national disease programs. CCMs request financing from the Global Fund on behalf of the country and provide strategic oversight to ensure effective and strategic implementation of the program.

An effective CCM is central to the Global Fund’s mission of “investing the world’s money to end AIDS, tuberculosis and malaria.” It is a unique country-level forum that brings together actors from all sectors, including affected populations, and other public health fora (e.g., for health system strengthening) to achieve the vision of a world free from the burden of these three diseases.

The Global Fund model is founded on certain principles, underpinned by a series of ethical values:

### Global Fund Principles

Country Ownership  
Partnership  
Transparency  
Performance Based Funding

### Global Fund Ethical Values

Duty of Care  
Accountability  
Integrity  
Dignity and Respect

As the main governance body charged with securing Global Fund financing and overseeing program success, the CCM is expected to embody the same principles and values. Ethical, transparent, and responsible decision-making by CCMs is key for program success at country level.

## Code Enforcement

This Code is incorporated as a component of Eligibility Requirement 6 of the Guidelines and Requirements for Country Coordinating Mechanisms. Consequently, the Global Fund will monitor CCM’s enforcement of this Code as a condition for access to Global Fund financing, and CCM Members’ adherence to the expectations set in this Code will inform the Global Fund’s appraisal of overall CCM performance.

The CCM is **required** to enforce individual member compliance with this Code, while ensuring fairness and due process. Consequences should be proportional and may include removal from decisions, leadership roles, or the CCM.

# CCM Members' Values

## Duty of Care

*CCM Members' duty of care is first and foremost to people living with, affected, or at risk of contracting AIDS/HIV, Malaria, and Tuberculosis.*

*CCM Members' obligations towards their constituency and stakeholders are expected to support, not undermine, this broader public health interest to end the epidemics.*

CCM Members are expected to ensure that Global Fund resources are used efficiently and wisely to achieve maximum impact by:

- Submitting funding requests that are designed to propose the most effective mix of interventions, including most effectively targeting key populations, as aligned with the National Strategic Plan/Investment Case
- Ensuring that implementers and systems are capable of implementing the grant
- Overseeing effective and timely implementation of grants with careful and appropriate use of resources in order to attain or surpass anticipated results
- Speaking out if the above activities are not happening

## Accountability

*CCM Members are accountable to the people they represent, and as a group, the CCM is also accountable to the mission of ending the epidemics within its country.*

*CCM Members are therefore expected to:*

*Be transparent*

*Prepare and actively participate in the CCM*

*Be responsible stewards of CCM assets*

*Manage information responsibly*

## Transparency

Since the CCM is a public body representing public health and stakeholder interests, CCM Members need to be open with the public, especially with those they represent, and to represent their constituents' views at the CCM. CCM Members are therefore **required** to:

- Share received information with constituents early enough and with enough detail to enable constructive feedback in time to influence a decision
- Collect and reflect constituents' views and concerns at CCM meetings, while retaining the duty of care to the broader public health interest
- Update constituents on CCM decisions, in particular when constituents provided input

## Preparation and Active Participation

CCM Members are expected to take their role on the CCM seriously:

- Regularly attend CCM meetings on time
- Prepare for meetings by reading background material and by fulfilling commitments made in prior meetings
- Ensure CCM decisions are properly documented
- Cooperate fully with the implementers and the Global Fund

CCM Members are **required** to actively hold implementers accountable by engaging in grant oversight, including by:

- Proactively making field visits (taking personal safety into consideration) and attending disease-related meetings
- Contributing feedback from constituencies on access, quality, and equity of grant sponsored services
- Participating in analysis of grant results and investigation of problems through dialogue with the implementers
- Contributing to efforts to solve problems which surpass the authority or capacity of the implementers
- Proactively identifying ways to improve the CCM's work

## Responsible use of CCM assets

The funds, office space, equipment, and transport offered to the CCM is intended to ensure that the CCM is fully functional. CCM Members are stewards of these assets, so they are **required**:

- Not to use CCM assets for personal or needs unrelated to CCM activities
- To ensure the assets are not damaged, misused, or lost
- To speak out if they are concerned that assets are being inappropriately used

## Responsible Information Management

CCM Members are expected to balance transparency with confidentiality. They do this by:

- Not sharing information that the CCM or Global Fund formally determine is confidential
- When information is not confidential, ensuring that it is made available to constituencies and the public
- Ensuring other CCM Members know and follow the rules on confidentiality
- Responsibly using and protecting computer IDs and passwords
- Remaining vigilant against cyber-attacks and scams and reporting them immediately to CCM leadership

## Integrity

*CCM Members are expected to act with  
Impartiality,  
Truthfulness and Accuracy,  
Fairness and Consistency, and  
Honesty.*

*As CCM Members make decisions, they are expected to  
prioritize the best interests of the populations affected by the  
three diseases.*

## Impartiality and Avoiding Conflicts of Interest

CCM Members have important connections outside of their role on the CCM, such as:

- Other roles in other organizations
- Responsibilities towards friends and family
- Membership in a political party or government
- Owning a company or NGO, or sitting on boards of directors

CCM Members also may be offered or seek to offer gifts, including benefits, travel costs and honours outside of their roles as a CCM Members.

These connections or gifts could create the impression of influence on CCM Members in:

- Making decisions that are not in the best interest of public health needs
- Inappropriately using CCM time or resources
- Sharing confidential CCM information
- Violating policies or integrity-related laws (such as anti-fraud or corruption laws)

CCM Members are expected to avoid perceived, potential, and real conflict of interest of this kind, CCM Members are **required** to comply with their Conflict of Interest Policy. In line with this policy, CCM Members **must**:

- Immediately disclose to the CCM any potential or actual conflict of interests
- Periodically declare conflicts of interests affecting anyone on the CCM
- Not accept or give gifts in connection with their CCM Member role

In the case of a conflict or the perception of one, CCM Members are **required** to follow the CCM Conflict of Interest Policy, including by:

- Recusing themselves from discussions, decisions, and voting where there is a conflict of interest, including decisions related to oversight and selecting or financing of implementers
- Speaking out if they are worried that a CCM colleague has connections and is not disclosing them or managing them properly

## Truthfulness and Accuracy

Important public health investment decisions are made on the basis of information and data such as:

- The nature and size of the disease burden
- The nature and scale of impact of interventions
- The nature and type of barriers to accessing health services for most affected and marginalized populations
- The pace and quality of program implementation
- The costs of interventions
- The reliability and quality of public health systems
- The reliability and quality of implementers

Therefore, CCM Members are expected to ensure that this information is accurately and completely reported and used. CCM Members are also **required** to speak out if they have concerns that data or information is influenced by unintentional or intentional errors such as manipulation, inflation, miscounting, incomplete, or incorrect statements.

## Fairness & Consistency

CCM Members are **required** to abide by and apply Global Fund and CCM rules, guidelines, codes or polices fairly and consistently. If a CCM Member has concerns that CCM rules, guidelines, codes or polices are not being followed, s/he has a **duty** to speak out.

### Relevant Global Fund Policies for CCMs

Reference Document	Provides Guidance on:
Guidelines and Requirements for CCMs*	<ul style="list-style-type: none"> <li>• The role and core functions of CCMs and their membership</li> <li>• The six requirements for CCM funding eligibility</li> <li>• Good governance principles and practice</li> <li>• The process for reviewing CCM performance</li> <li>• Technical and financial assistance available to CCMs</li> <li>• Standards which the Global Fund considers vital for effective CCM performance, and recommendations based on good practice</li> </ul>
The Code of Conduct for Recipients**	<ul style="list-style-type: none"> <li>• The principles and standards of conduct for all recipients of Global Fund grants</li> </ul>
The Policy on Ethics and Conflict of Interest**	<ul style="list-style-type: none"> <li>• Identification of actual or potential conflicts of interest</li> <li>• The responsibility to disclose actual or potential conflicts of interest, and the procedure for addressing such conflicts</li> </ul>
The Whistle-Blowing Policy and Procedures**	<ul style="list-style-type: none"> <li>• The Global Fund's confidential procedures for reporting possible misconduct or irregularities so that appropriate remedial action can be taken</li> </ul>
CCM Funding Policy*** Guidelines for CCM Funding*** CCM Funding Step-by-Step Guide***	<ul style="list-style-type: none"> <li>• Instructions on how to apply for CCM funding from the Global Fund, the eligible uses of CCM funding, and how expenditures should be tracked by CCMs</li> </ul>
<p>* Accessible at <a href="http://www.theglobalfund.org/en/ccm/guidelines/">http://www.theglobalfund.org/en/ccm/guidelines/</a>  ** Accessible at <a href="http://www.theglobalfund.org/en/governance/">http://www.theglobalfund.org/en/governance/</a>  *** Accessible at <a href="http://www.theglobalfund.org/en/ccm/funding/">http://www.theglobalfund.org/en/ccm/funding/</a></p>	

## Honesty

CCM Members must guard against misuse of resources, fraud and corruption and, in particular, comply with the Global Fund Policy to Combat Fraud and Corruption. They must not tolerate or take part in any arrangements to divert, falsely report, or use Global Fund funds, assets, or data for anything other than the intended purpose, especially not for personal, criminal or political purposes. CCM Members are **required** to support efforts that:

- **Prevent corruption:** Make sure Global Fund funds are used properly
- **Detect corruption:** Actively condemn if others engage in corruption
- **Stand up to corruption:** Speak out when they have a suspicion of corruption

## Dignity & Respect

*Members of the CCM treat people with dignity and respect by Upholding the dignity of beneficiaries, and Respecting colleagues.*

### Ensuring respect for human rights, including non-discrimination

CCM Members are **required** to ensure that programs financed by the Global Fund are designed to promote dignity, respect and empowerment of people and communities affected by HIV/AIDS, Tuberculosis and Malaria, as well as key and vulnerable populations, especially as they face stigma or marginalization.

### Ensuring an atmosphere of mutual respect

In interactions with fellow CCM Members, Implementers, and Global Fund staff, CCM Members are expected to maintain an enabling environment guided by mutual respect.

CCM Members are therefore expected to practice and promote respectful deliberations, decision-making, and social interactions in all CCM-related settings. They are expected to treat colleagues with courtesy and respect, without harassment, or physical or verbal abuse, and not exert undue influence on their activities. They are expected to ensure that the debates reserve sufficient time for all to speak, and that decisions are made after thorough consideration of the views expressed by all CCM Members.

CCM Members are **required** to abstain from all forms of bullying, harassment (including sexual harassment) and discrimination.

### The Global Fund prohibits and addresses all forms of fraud and corruption.

The Global Fund's Policy to Combat Fraud and Corruption outlines specific "Prohibited Practices" which all CCM Members are **required** to prevent, detect, and report.

The following practices are prohibited:

- **Corrupt Practices:** Bribes, kickbacks, and influencing decisions in exchange for favors
- **Fraudulent Practices:** Lying about use of funds or information used to make funding decisions
- **Coercive Practices:** Intimidating or threatening someone to improperly influence them
- **Collusive Practices:** Whenever two or more collaborate to carry out Prohibited Practices
- **Abusive Practices:** Theft, embezzlement, or intentional waste
- **Obstructive Practices:** Failing to report Prohibited Practices to the Global Fund despite suspicion or knowledge, or blocking the Global Fund from finding evidence of Prohibited Practices
- **Retaliation:** Harming or seeking to harm anyone who either refuses to engage in Prohibited Practices or in good faith reports it.
- **Money Laundering:** Managing or moving funds that are connected to criminal activity
- **Financing of Terrorism:** Managing or moving funds that are intended to finance terrorism

## Speaking Out

### What does it mean to speak out?

In its most general form, to speak out means to raise questions, concerns, or share knowledge of situations where this Code or other policies are not being adequately upheld. CCM Members are encouraged to support one another and hold one another accountable by proactively discussing whether their decision-making and behaviour are consistent with this Code. If initial efforts yield insufficient change, CCM Members are **required** to raise their concerns more formally within the CCM governance structure as well as with the Global Fund.

### Can speaking out help?

By speaking out, CCM Members give others the chance to take action and to support them:

- **Asking for clarifications or advice** increases a member's chances of doing the right thing.
- **Pointing out** behavior that is inconsistent with this Code may influence the behavior of colleagues.
- **Raising the matter formally** to the CCM allows the CCM to respond appropriately and to strengthen the ethical culture of the CCM.
- **Escalating** the matter to the Global Fund allows for:
  - Receiving confidential advice from the Ethics Officer or the OIG
  - Protection of the speaker's identity
  - Global Fund intervention at an operational level
  - A fact finding exercise to be undertaken
  - If appropriate, penalties to be initiated
  - If appropriate, law enforcement to be informed

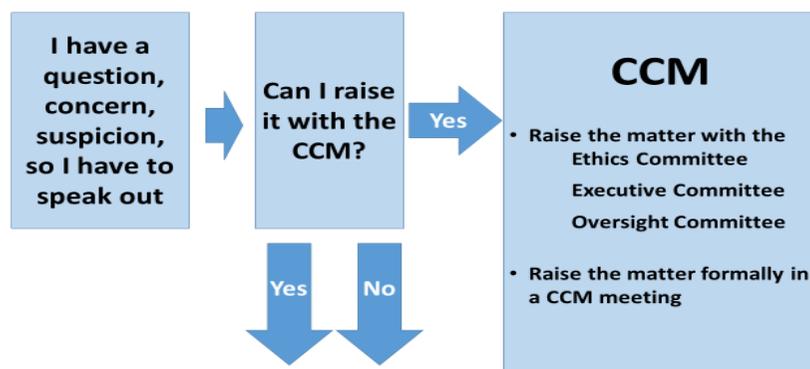
### CCM Members have a duty to report.

The CCM as a body is **required** to immediately report suspicion or knowledge of all forms of fraud and corruption (defined as Prohibited Practices) to the Global Fund. Therefore, if a CCM Member has suspicion or knowledge of Prohibited Practices in Global Fund activities, s/he also has a **duty** to report this information, either through formal CCM channels, or directly to the Global Fund. Note that failure to report suspicion or knowledge of prohibited practices is itself the prohibited practice of "obstruction."

The Global Fund has made confidential and/or anonymous reporting and advisory services available to CCM Members through the channels described in the schematic below. Under the Global Fund's Whistleblowing Policy, those reporting any wrongdoing to the OIG may do so anonymously or confidentially and the Global Fund maintains processes to prevent, detect, and respond to any retaliation against reporting.

## How can I report or seek confidential advice?

Speaking out takes courage and strength of character, so your decision to take action is greatly appreciated and will be acted on with respect and sensitivity to your personal security.



## The Global Fund

**For General Advice**

- Your FPM
- CCM Hub [ccm@theglobalfund.org](mailto:ccm@theglobalfund.org)

**For Confidential Advice:**

- Ethics Officer [ethics@theglobalfund.org](mailto:ethics@theglobalfund.org)

**To Report Wrongdoing:**



Confidential OIG hotline:  
<http://www.ispeakoutnow.org>  
+1 704 541 6918 (free service)

Here are the practical steps:

- You have **multiple channels** of speaking up available within the CCM, whether it be with a fellow member, a committee chair or vice chair, or a member of the Executive Committee or the CCM Secretariat. You might also consider contacting the Local Fund Agent. Please reach out to the channel you are most comfortable with.
- You are **required** to report directly to the Global Fund (1) if you have a suspicion or knowledge of Prohibited Practices; (2) if you cannot speak out within the CCM, or (3) if your efforts to date have resulted in inadequate response. You may contact various channels within the Global Fund Secretariat, such as the Country Team, the FPM, the CCM Hub, the Ethics Officer, or the OIG. Please reach out to the channel you are most comfortable with.
- If you have **concerns about retaliation** or fear for your personal or family's safety for speaking out, do so confidentially (e.g., to the Global Fund Ethics Officer) or through the Global Fund's "I Speak Out Now" hotline, where you can report confidentially, anonymously, or claim whistleblower status.
- Any time you speak with someone, **provide details:**
  - ✓ What happened?
  - ✓ Where?
  - ✓ When?
  - ✓ Names of everyone involved
  - ✓ Why is this a problem?
  - ✓ Other information
- **If possible, keep written records of what you said to who, when and the responses you got.** This will allow you to demonstrate you held up your duty to report.
- **Don't stop** speaking up: If the problem continues or repeats, speak to another channel.