

DOCUMENT ADMINISTRATION

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1.0	Approved by: The Alliance & Fund Boards	26 June 2008 Effective from: 1 January 2009
	Next review:	On yearly basis after six full months of initial implementation
2.0	Reviewed by: Gavi Programme and Policy Committee	10 October 2013
	Approved by: Gavi Alliance Board	Effective from: 1 January 2014
	Next review:	2019
	Terminology review update	15 February 2025

1. Goal and scope of the policy

- 1.1. The goal of Gavi's Transparency and Accountability Policy is to ensure that all Gavi-support at country level is managed in a transparent and accountable manner through systems that include appropriate oversight mechanisms and that the support is used according to the programme objectives as outlined in individual country agreements.
- 1.2. The policy governs the transparency and accountability aspects of Gavi's support provided in the form of cash, vaccines and vaccine devices at country level. The vaccine element of the Policy will focus on cases of misuse and not on issues relating to supply chain efficiency and wastage as these are outside the scope of this policy.

2. Principles of the Transparency and Accountability Policy

- 2.1. A set of key principles will govern all forms of oversight extended by Gavi with regard to transparency and accountability. These principles are in line with the commitments of The Paris Declaration, the Accra Agenda for Action and the Busan Partnership for Effective Development Co-operation on Aid Effectiveness¹. The Gavi Alliance will:
 - 2.1.1. Respect aid effectiveness principles: Rely on, build on and ensure alignment with existing country systems, including joint financing and monitoring mechanisms, to the greatest extent possible.
 - 2.1.2. Focus on prevention: Prevent misuse of any Gavi support through regular monitoring and by ensuring that robust oversight mechanisms for cash and vaccine support are agreed with, established and maintained in each country
 - 2.1.3. Relate monitoring to risk: Apply a country-by-country monitoring approach to reduce risks in an equitable and transparent manner.
 - 2.1.4. Promote flexibility and country ownership: Apply a flexible approach to the use of cash support adjusted to the country context.
 - 2.1.5. Promote mutual accountability: Agreements governing support will be mutually agreed between Gavi and country with shared responsibility of oversight.
 - 2.1.6. Strengthen country systems: work with countries and in-country partners to strengthen country systems.
- 2.2. The Gavi Alliance Transparency and Accountability policy establishes a set of minimum standards for the management of Gavi support. Gavi holds all recipient governments accountable for the support it provides and expects that proper financial and vaccine management and accountability systems are in place. All Gavi support to countries should:
 - 2.2.1. Be used for the purposes stated within the proposal or as agreed through any subsequent reprogramming requests;
 - 2.2.2. Be managed in a transparent manner with clear accountability structures for regular monitoring and oversight;

¹ <http://www.oecd.org/dac/effectiveness/>

- 2.2.3. Be supported by the provision of accurate and verifiable reports on a regular basis as specified by individual funding arrangements;
- 2.2.4. Be managed within processes that meet national legal requirements and international standards regarding transparency, accountability and anti-corruption.

3. Risk assessments

- 3.1. Gavi will strengthen its processes to ensure that mechanisms are in place to assess, monitor and, where relevant, strengthen country and implementing partner systems in order to safeguard Gavi support, be it in the form of cash or vaccines and related devices, once it reaches the country.
- 3.2. The Gavi Secretariat undertakes an on-going risk assessment of systems used to oversee Gavi support for each country. The aim of this risk assessment is to identify countries and programmes that are in need of closer monitoring and/or that may be subject to audit in the coming year. The risk assessment will be determined using information from various sources.

4. Cash

- 4.1. Systems for management of Gavi's cash support will be agreed with the respective country.
 - 4.1.1. Prior to the submission of a proposal, the Gavi Secretariat will, together with the government and in-country development partners, reach a consensus on the specific financing modality best suited for the Gavi support. Where possible, priority will be given to existing country systems.
 - 4.1.2. The chosen modality will receive the endorsement of the Health Sector Coordination Committee or equivalent if such structures are in existence.
 - 4.1.3. Gavi, together with each Implementing Country Government, will establish and agree upon minimum requirements for the specific financing modality. These requirements will be determined based on the existing mechanisms in the selected system as well as on the relative level of fiduciary risk as established by the financial management and/or other Gavi or implementing partner assessments.
 - 4.1.4. Countries will manage their Gavi cash transfers and provide financial reports in accordance with the terms outlined in this policy and in the individual country agreements. Failure to comply with these requirements could result in a variety of measures including the suspension of funding.
 - 4.1.5. Each eligible country applying for or receiving Gavi cash transfers will identify a department or an individual within the Ministry of Health to oversee compliance with this policy.

5. Vaccines

- 5.1. New vaccine support constitutes the largest share of Gavi's investment portfolio. While vaccines distributed routinely through public systems may represent a lower risk of misuse compared to cash payments, appropriate oversight is nevertheless required. Therefore the Gavi Alliance commits to:
- 5.1.1. Ensure that each eligible country applying for or receiving vaccine support identifies vaccine oversight responsibility and accountability structures² to oversee compliance with this policy with regards to vaccines and related devices. If a country is unable to identify ownership of oversight, Gavi will work with in-country partners to build this capacity.
 - 5.1.2. Work with the country and in-country partners in situations deemed to be associated with high risk for misuse of vaccine support to determine if, when and where to launch spot checks or more extensive assessments.
 - 5.1.3. Monitor that countries manage their vaccine support and provide reports in accordance with the terms of this policy as well as the individual country agreements.
 - 5.1.4. Monitor country compliance with reporting requirements (e.g. through on-going grant reviews, confirmation of delivery report) and follow up where spot checks reveal significant findings.

6. Misuse, suspected misuse and corrective action

- 6.1. The Gavi Secretariat, with support from its partners, will monitor country compliance with the Transparency and Accountability Policy, including specific requirements for individual countries.
- 6.2. Should the Gavi Secretariat receive information suggesting that Gavi cash or vaccine support has been misappropriated or misused, Gavi will launch an investigation in collaboration with the country. The purpose of such an investigation is to undertake a 'forensic' level of examination in cases of possible misuse, to evaluate whether misuse has occurred, and if so, to determine the value of misused funds.
- 6.3. In cases where there is evidence of misuse, verified to the Secretariat's satisfaction, the Gavi Secretariat may, at its own discretion, suspend further cash transfers and begin the process to take corrective action. It will simultaneously inform and consult with the Chair of the Gavi Alliance Board.
- 6.4. Gavi will not suspend vaccine programmes based on evidence of misuse. However, other mitigations may be agreed on a case by case basis where misuse of vaccine support has been confirmed.

² e.g. the Ministry of Health, Inter-Agency Coordinating Committees, National Immunization Technical Advisory Groups, Gavi implementing partners

7. Timeline for implementation and review

- 7.1. The policy will take effect as of 1 January 2014.
- 7.2. The Gavi Secretariat will report to the Board on the implementation of this policy on a yearly basis.
- 7.3. A review of the Transparency and Accountability Policy will be conducted in 2019, or earlier if requested by the Board. Based on the results, the Gavi Alliance may consider revising the policy.

ANNEX - M&E framework for the Gavi Alliance Transparency and Accountability Policy and possible implementation of the policy

1. Purpose of this framework

This framework articulates the theory of change and intended outcomes and impact from the revised Gavi Alliance Transparency and Accountability Policy (the '**Policy**') and possible implementation of the policy.

2. Policy goal

The goal of the Policy is to ensure that all Gavi support at country level is managed in a transparent and accountable manner through systems that include appropriate oversight mechanisms and that the support is used according to the programme objectives as outlined in individual country agreements.

3. Scope

The revised Policy will include all Gavi support in the form of cash transfers and vaccines (vaccines and vaccine devices) provided to countries. The revised Policy puts a stronger emphasis on prevention through more intense monitoring of Gavi support in what is assessed to be high risk environments without reducing the oversight below current levels in lower risk countries. The vaccine oversight will focus on cases of misuse and not on issues relating to supply chain efficiency and wastage as these are outside the scope of this policy and are being addressed by other work streams.

4. Theory of change

The implementation of the Policy will enable Gavi to increase its ability to prevent, detect and investigate misuse of support (both cash and vaccine) provided to countries, resulting in Gavi funds being used for the intended purposes.

This objective will be achieved through the following policy and implementation aspects:

- 4.1 Existence of a policy will set expectations for mutual accountability between Gavi and countries through definition of appropriate oversight mechanisms, as well as guide both Gavi and country in ensuring that support is used according to the programme objectives as outlined in individual country agreements.
- 4.2 Extension of oversight to vaccine support will verify that oversight mechanisms are in place for vaccines, as well as cash support, which will contribute to ensuring that vaccines are used appropriately for their intended purpose.

- 4.3 The implementation of the policy will ensure systems are used as to avoid replication and overburdening countries (Aid Effectiveness principles).
- 4.4 On-going monitoring, which is intensified in high-risk environments, will verify that at the country level, there are mechanisms to ensure cash management and that disbursements occur through financially-sound mechanisms that are transparent and traceable and that the support is used as intended. Since rollout of the original policy, the implementation of the Policy has been revised over time to be better fit for purpose. Experience to date has indicated the need for more intensified monitoring on an on-going basis through appropriate tools developed by the Secretariat. This will happen under the new policy.
- 4.5 Although subject to a separate work stream and outside the policy scope, strengthened vaccine oversight systems may contribute to less avoidable wastage of vaccine stock.
- 4.6 Concerted and improved training provided to countries through the implementation of the policy, will strengthen capacity at the country level to contribute to meeting the objective of the policy.

5. Key assumptions underpinning the results framework and theory of change

- 5.1 Gavi Secretariat and partners have sufficient resources and capacity to carry out cash and vaccine oversight as needed.
- 5.2 The implementation will rely on existing country systems and aims to contribute to building country capacity and align with country systems; countries will have capacity to implement action plans recommended through audits and Policy assessments.
- 5.3 Countries see the merit in developing sound financial management and vaccine oversight systems.
- 5.4 Other on-going work streams (such as the UNICEF work through the business plan, Supply Chain Management work at the Secretariat) will in time provide additional support to vaccine oversight.
- 5.5 The Policy will continue to work through existing country systems and in partnership with countries.
- 5.6 The Gavi Secretariat will continue to collaborate and co-ordinate with implementing and other partners (e.g. the World Bank, the Global Fund, bilateral partners) and participate in joint missions and reviews where relevant.

6. Monitoring and evaluation

Implementation of the Policy will be monitored by the Gavi Secretariat as outlined in the framework below.

The Policy does not cover specific implementation aspects, which will be revised and amended on an annual basis as deemed necessary by the Policy and Country Programmes teams, using data available from annual progress reports, audit reports and as collected through the grant monitoring process.

Figure 1: GAVI Alliance TAP policy 2013 Results Framework