POLICY AND COMMUNICATIONS PROTOCOL ON MISUSE OF GPE TRUST FUNDS

June 2026

GPE Transforming Education

Note

Approved by the GPE Board of Directors at its meeting on June 7–8, 2012 (BOD/2012/06-09) and updated following the adoption of the strengthened operational model by the Board in October 2015 (BOD/2015/10-02). The policy was further updated in June 2026 as per Board request (BOD/2026/06-06).

Definitions

In this Policy and Communications Protocol for the Global Partnership for Education (GPE):

- "**Board**" means the Board of Directors of GPE, as described in the Charter.
- "**Charter**" means the Charter of GPE adopted by the Board, as amended from time to time in accordance with its terms.
- "**Contribution Agreement**" has the same definition as in the Trust Fund Governance Document.
- "**Financial Procedures Agreement/Arrangement**" and "**Financial Procedures Memorandum**" have the same definition as in the Trust Fund Governance Document.
- "**Finance and Risk Committee**" is a standing committee established by the GPE Board of Directors to provide oversight on risk management practices and financial management of the GPE and its resources.
- "**GPE Trust Funds**" means all of the current and future trust funds established as funding vehicles for GPE.
- "**GPE partner**" means the entities that are partners of GPE, as described in the Charter.
- "**Grant agent**" means an entity designated to receive cash transfers from the GPE Trust Funds and implement or supervise an activity as such entity is approved by the Board in consultation with the Trustee.
- "**Grant Agreement**" has the same definition as in the Trust Fund Governance Document.
- "**Local education group**" has the same definition as in the Trust Fund Governance Document.
- "**Misuse**" is defined to include using funds for the purpose other than for

which they were approved and any or all of the following practices in respect of GPE Trust Funds:

  - **Corruption:** offering, giving, receiving or soliciting, directly or indirectly, anything of value to influence improperly the actions of another party.

  - **Fraud:** any act or omission, including a misrepresentation, that knowingly or recklessly misleads, or attempts to mislead, a party to obtain a financial or other benefit or to avoid an obligation.

  - **Coercion:** impairing or harming, or threatening to impair or harm, directly or indirectly, any party or the property of the party to influence improperly the actions of a party.

  - **Collusion:** an arrangement between two or more parties designed to achieve an improper purpose, including influencing improperly the actions of another party.

  - **Obstruction:** deliberately destroying, falsifying, altering or concealing of evidence material to the investigation or making false statements to investigators in order to materially impede an investigation.

- **"Proposal"** has the same definition as in the Trust Fund Governance Document.

- "**Secretariat**" has the same definition as in the Charter.

- "**Trustee**" has the same definition as in the Trust Fund Governance Document.

- "**Trust Fund Governance Document**" means the GPE Trust Fund Governance Document adopted by the Board as amended from time to time in accordance with its terms.

Introduction

GPE partners seek to ensure the most effective use of all resources supporting partner countries' education goals. Due to the need for support, GPE Trust Fund resources will sometimes be allocated for use in environments where there is high risk of misuse of funds, through fraud, corruption and other practices. This could lead to GPE Trust Funds being used for a purpose other than that for which they were approved by the Board of Directors.

Implementation by all GPE partners of effective good governance and anti-corruption strategies in education programming helps to foster an environment intolerant of practices leading to misuse. The decisions on how to engage in difficult governance environments must be informed by an understanding of the nature of the risks and the potential impact on development effectiveness and poverty reduction. The effects of these risks take many forms: from relatively minor problems in resource use—sometimes caused by a lack of capacity—to financial mismanagement and corrupt procurement practices, to major corruption and large-scale diversion of funds. In supporting implementation of partner country programs, especially those for which GPE Trust Fund resources have been allocated, GPE partners seek to understand the nature of the challenge, and to identify the most appropriate entry points for strengthening governance systems and preventing misuse.

This Policy and Communications Protocol is framed in the context of the above. While it encourages open communication among all GPE partners on all resources supporting implementation of endorsed education plans, it specifically addresses the roles and responsibilities related to misuse of GPE Trust Funds. It recognizes that the Board of Directors approves only grant agents that have policies and procedures to mitigate risk of misuse of funds and to address misuse should it occur. It does not attempt to duplicate or substitute for those agencies' policies and procedures. It recognizes the role of the Finance and Risk Committee to oversee the development and the monitoring of the implementation of policies and other measures on fraud, corruption and other misuse of GPE resources, including recommending action to the Board based on information communicated semi-annually by the Secretariat to the Committee or when it arises.

This Policy and Communications Protocol will be supplemented by a review and assessment of the fiduciary standards and practice of all grant agents as a tool to support the Board of Directors' decision-making processes.

A. POLICY ON MISUSE OF GPE TRUST FUNDS

1. **Zero Tolerance of Misuse of GPE Trust Fund resources.** GPE partners have zero tolerance for misuse and will use their own policies to always take action to address the misuse and secure recovery of GPE Trust Fund resources lost to misuse.

2. **Principle of Accountability; Prevention and Protection from Misuse.** GPE operates on the principle of accountability. While GPE partners cannot prevent all potential misuse, GPE partners involved in the supervision, management or implementation of activities funded through GPE Trust Fund resources must provide reasonable assurance that those resources will be used as approved by the Board. GPE partners who are involved with GPE processes, in particular processes related to the funding of country-level activities through the GPE Trust Funds, are expected to be alert to misuse. Accountability and transparency with regard to misuse, and its early detection:

   a. help prevent and deter future incidents of misuse;

   b. contribute to knowledge and understanding of the nature of fraudulent, corrupt or other practices that lead to misuse, and improve institutional capacity of stakeholders to strengthen internal systems for detection and accountability for all public funds;

   c. build donor confidence in GPE and contribute to resource mobilization for the education sector; and

   d. increase the efficiency and effectiveness in the use of the GPE Trust Funds in order to deliver maximum results in the work of GPE to reach the Education for All goals as set out in the Charter.

3. **Roles and Responsibilities with respect to GPE Trust Funds:**

   a. **The GPE Board**:

      i. approves or delegates the approval of all allocations from the GPE Trust Funds;

      ii. approves the eligibility of entities that may act as a grant agent;

      iii. approves only grant agents that have policies and procedures for addressing misuse and for protecting whistleblowers;

      iv. exercises its responsibilities in compliance with the Policy on Conflicts of Interest (as may be approved by the Board, from time to time) and in a way that minimizes the risk of misuse; and

v. approves criteria for imposing temporary or permanent ineligibility for access to GPE Trust Funds of a grant agent, partner country, civil society organization, private sector organization or any other organization found by the Board to have engaged in misuse in relation to GPE Trust Fund resources.

b. **Partner country governments, civil society organizations and private organizations** implementing programs supported by GPE Trust Funds maintain financial management and procurement systems with strong internal controls that seek to prevent, detect and respond to misuse, including procedures to recover funds which have been misused. They also communicate any findings of misuse to the Secretariat and report, through the through the grant agent on measures taken or planned to recover funds which have been misused and prevent recurrence of misuse.

c. **Multilateral and bilateral agencies and eligible organizations acting as grant agents** have special fiduciary responsibilities with respect to GPE Trust Funds, as set out in the relevant Financial Procedures Agreement/Arrangement or Financial Procedures Memorandum. Only grant agents approved by the Board may receive funds directly from GPE Trust Funds.

When acting as grant agents, they:

i. embed a governance and anti-corruption focus in activities funded through GPE Trust Fund resources;

ii. maintain regular, open, and immediate communication with the local education group and the Secretariat regarding credible allegations of misuse, taking into account the provisions of paragraph 9 below;

iii. familiarize themselves with the nature of governance challenges that could lead to misuse, remain alert to indications of such challenges, maintain financial management and procurement processes that seek to prevent and detect misuse, and promptly take actions applicable to the role of grant agent, to address misuse if it occurs.

iv. conduct appropriate due diligence of the financial and procurement systems of a partner country government or other entity receiving funds under a Grant Agreement as per the Proposal approved by the Board, and advise the Board of their assessment of those systems;

v. promptly return to the relevant GPE Trust Fund any funds that it recovers from a partner country or other implementing partner due to misuse;

vi. comply with the instructions of the Board to promptly return fund to the Trustee when it has been confirmed that the GPE Trust Fund resources

transferred to the grant agent have been used by the grant agent in a manner inconsistent with the terms of a corresponding Financial Procedures Agreement/Arrangement or Financial Procedures Memorandum or the applicable decisions of the Board;

vii. ensure that their Grant Agreements with the partner country or other organization conform with their standard agreements for transfer of funds to implementing partners; and

viii. ensure that, where GPE Trust Fund resources are used by an implementing partner under a Grant Agreement, appropriate contractual provisions or other measures are in place, consistent with the grant agent's own policies and procedures, to prevent, detect and respond to misuse of GPE Trust Fund resources, including use of external audits, recovery of misused funds where feasible, suspension of further transfers where appropriate, implementation of measures to prevent recurrence, and proportionate remedial action where misuse or material fiduciary risk is identified.

d. **Members of local education groups**, comprising partner country governments, local donors, civil society organizations, multilateral agencies and the private sector and private foundations have a role to play in monitoring the implementation of the endorsed education plan of partner countries. Local education group members are encouraged to communicate with each other regarding any information they may have on possible or suspected misuse of funds in the education sector. The local education group is expected to be in regular and open communication with the Secretariat and other stakeholders regarding credible allegations and/or evidence of any misuse in the education sector, and with regard to GPE Trust Funds in particular, including steps taken to address the issue. In dealings with the Secretariat, the local education group acts through the coordinating agency.

The Secretariat is the focal point for communications on credible allegations or evidence of misuse of GPE Trust Fund resources and shall communicate information to the Board and the Finance and Risk Committee in accordance with the Communications Protocol set out in Part B below. The Secretariat shall be in regular communication with the local education group and with the grant agents to help mitigate the risk of and detect misuse and to assist, if appropriate, in addressing misuse when it occurs, including taking actions to support recovery and reimbursement of funds to the GPE Trust Funds.

At all times, the Secretariat shall take all necessary measures to support the grant agent in fulfilling its fiduciary responsibilities as described in paragraph c. above. The Secretariat shall develop and share guidance and approaches to assist in selection, design and implementation of good practice for the

education sector as a means to contribute to risk mitigation.

e. **The Finance and Risk Committees** oversee the development and the monitoring of the implementation of policies and other measures on fraud, corruption and other misuse of GPE resources, including recommending action to the GPE Board based on information communicated semi-annually by the Secretariat to the Committee or when it arises.

4. Requirements in GPE Trust Fund documents and on whistleblowing:

a. **Financial Procedures Agreements/Arrangements and Financial Procedures Memorandum:** Financial Procedures Agreements/Arrangements, the Financial Procedures Memorandum or other documents transferring funds to grant agent shall include the following obligations of the grant agent:

   i. to exercise the same degree of care and diligence in the discharge of its functions with respect to GPE Trust Funds as it exercises with respect to the administration and management of its own resources, and do any and all such acts as may be necessary or appropriate for the proper administration of the accounts in which the GPE Trust Fund resources are received;

   ii. to be accountable to the Board for its GPE Trust Fund-financed activities; and

   iii. to be responsible for the use of the GPE Trust Fund resources and the activities carried out therewith in accordance with (i) its own policies and procedures including, where applicable, those related to eligible expenditures, employment and supervision of consultants and the procurement of goods and works and its framework to combat fraud and corruption, and (ii) the applicable decisions of the Board, including the purpose for which the specific allocation has been approved by the Board.

b. **Grant Agreements.** Grant Agreements between grant agents and partner country governments, civil society organizations or other organizations shall:

   i. include all appropriate measures to handle financial management of the funds in accordance with the grant agent's policies and procedures for Grant Agreements;

   ii. provide that if the Board or the grant agent determines that the GPE Trust Funds are used in a manner inconsistent with the Grant Agreement, the partner country government or other organization receiving funds shall promptly refund the GPE Trust Fund resources to the grant agent and the grant agent will promptly return those resources to the Trustee; and

iii. include triggers for suspension of GPE Trust Fund resources in accordance with the grant agent's policies and procedures.

c. **Whistleblowing.** Grant agents approved by the Board shall maintain policies to protect employees from retaliation due to providing information in relation to misuse.

5. **Communication of Policy.** The Secretariat shall disseminate this policy to all GPE partners, post it on the GPE website and include it in the Global Governance Manual and Grant Guidelines. In addition, a copy of this Policy shall be sent to all local education groups upon notification of an allocation from the GPE Trust Funds.

B. COMMUNICATIONS PROTOCOL

Disclosure of information by a grant agent shall be subject to that grant agent's regulations, rules, policies and procedures on disclosure.

6. **Principle of transparency.** GPE comprises partner countries, donors, civil society organizations, the private sector and private foundations, and multilateral agencies. It operates in an open and transparent manner. As set out in the Charter, "Relationships and communications among partner countries, donors, multilateral agencies, civil society organizations and the private sector and private foundations are built on clarity and transparency."

7. **Communication to the Secretariat.** As set out in the Policy in Part A above, GPE partners have zero tolerance for misuse once it has occurred and take action, according to their own regulations, rules, policies and procedures, to address the misuse, including taking steps to secure recovery of GPE Trust Fund resources lost to misuse. Subject to the considerations referenced in paragraph 9 below, all GPE partners are expected to communicate promptly information regarding credible allegations of misuse to the relevant grant agent and to the Secretariat.

8. **Communication to the Board and the Finance and Risk Committee.** It is essential that information be shared with the Board and the Finance and Risk Committee as soon as possible regarding potential or actual misuse. Early disclosure enables the Board to act swiftly in response to information on misuse and be prepared for further enquiries from stakeholders.

9. **Procedures for communication to the Board; Confidentiality**

a. Board Members, Alternate Board Members, members of the Finance and Risk Committee and one representative of each donor to the GPE Trust Funds are eligible to receive official communications from the Secretariat regarding misuse. All persons eligible to receive such information are required to provide written confirmation in the form contained in the Annex hereto that they will respect the confidentiality of the information provided in this way. Persons having provided this written confirmation shall be placed on a

restricted email list for the purpose of communicating on issues of misuse. Further sharing of this information shall be limited to that which is required by the policies of the respective organizations. All persons eligible to receive such information shall make efforts to ensure that anyone with whom the information is shared is aware of the need to maintain the confidentiality of the information.

b. Upon receipt of information relating to credible allegations or evidence of misuse of GPE Trust Funds, the Chief Executive Officer of the Secretariat shall advise the Chair of the Board of the content of the information. The Chair of the Board and Chief Executive Officer shall immediately send a joint communication to the restricted email list, disclosing the information unless the amount of money at stake is immaterial or unless, under exceptional circumstances, they decide it is necessary to maintain the confidentiality of such information in order to:

   i. protect an ongoing investigation of those involved in the potential misuse;

   ii. avoid compromising any legal or other action taken by the national authorities of the country involved;

   iii. protect the personal safety of those undertaking the investigation;

   iv. protect persons making reports of misuse ("whistleblowers"); and/or

   v. avoid legal and other action (defamation, etc.) due to the release of detailed and possibly unsubstantiated allegations against those potentially involved in the misuse.

10. **Public disclosure.** The Chief Executive Officer and the Chair of the Board will issue a public statement about misuse, including through a press release and/or a posting on the GPE website, except in circumstances described in paragraph 4.b above. Any public disclosure will be made in coordination with the relevant grant agent.

11. **Report at Board Meetings.** The Chief Executive Officer shall provide a written report for, and verbal report at every face-to-face Board meeting, in executive session if necessary, regarding information known at the time regarding misuse, subject to paragraph 9.b. above.

12. **Lessons learned.** On an annual basis, starting with the second meeting of the Board in 2013, the Secretariat shall prepare a paper for consideration by the Board of the lessons learned for in-country and global management of GPE Trust Fund resources from the findings of misuse, if any, over the previous year. Such reports shall include recommendations based on the lessons learned for the Board's consideration.

13. **Policy and sources.** The policies and procedures outlined in this document are an elaboration of the principles set out in the Charter and the Trust Fund Governance Document. All partners are encouraged to support the full implementation of this policy. This Policy and Protocol shall not be interpreted or applied in any way that violates the regulations, rules, policies and procedures of any GPE partner including their respective control, oversight, and accountability frameworks.

Annex

Whereas, pursuant to the Global Partnership for Education Policy and Communication Protocol on the Misuse of Trust Funds (the "Policy"), approved by the Board of Directors of the Global Partnership in Decision BOD/2012/06-09, paragraph B. 9, as amended in BOD/2015/DOC 21- Board-Decisions Rev1.docx, Board Members, Alternate Board Members, members of the Finance and Risk Committee, and one representative of each donor to the GPE Trust Funds are eligible to receive official communications from the Secretariat regarding misuse (as defined in the Policy) by being placed on a restricted email list; and

I am the (Board Member/Alternate Board Member) for the (name) constituency of the Board of Directors

OR

a Finance and Risk Committee Member

OR

a representative of (agency name), a donor to the GPE Trust Funds,

THEREFORE, I understand that the messages I will receive from the restricted email list are not public documents, are of a confidential nature and are in most cases allegations that are not proven in a court of law. I will not share the messages, or the content of the information contained in the messages with persons not on the restricted email list, other than persons within my organization that are required to be informed under the policies of my organization. I will also make efforts to ensure that anyone with whom I share information from the restricted email list is aware of the need to maintain the confidentiality of the information.

(Signature)

(Name)

(Title)

(Organization)

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