

# Operational Policy Note

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## Grant Entity Data

**Approved on:** 11 November 2023  
**Approved by:** Executive Grant Management Committee  
**Process Owner:** Finance

### Overall Objective

1. The grant entity data (GED) process<sup>1</sup> enables the efficient and effective delivery of all grant life cycle processes through use of accurate and updated information on Coordinating Mechanisms (CM)<sup>2</sup>, Principal Recipients (PR)<sup>3</sup>, Local Fund Agents (LFA) and third-party organizations (Third Party). These are Global Fund partners that are actively engaged in the grant life cycle and collectively referred to as “Grant Entities” in this OPN.
2. The GED process is facilitated through the Global Fund Partner Portal, an online platform that serves as a central point of information entry and document sharing.
3. GED refers to the 16 data sets presented in the diagram below. These data sets are critical to the execution of grant life cycle processes and may have legal and/or grant funding implications (i.e., used in the preparation of legal documents and/or release of Grant Funds).

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<sup>1</sup> Formerly known as Master Data process.

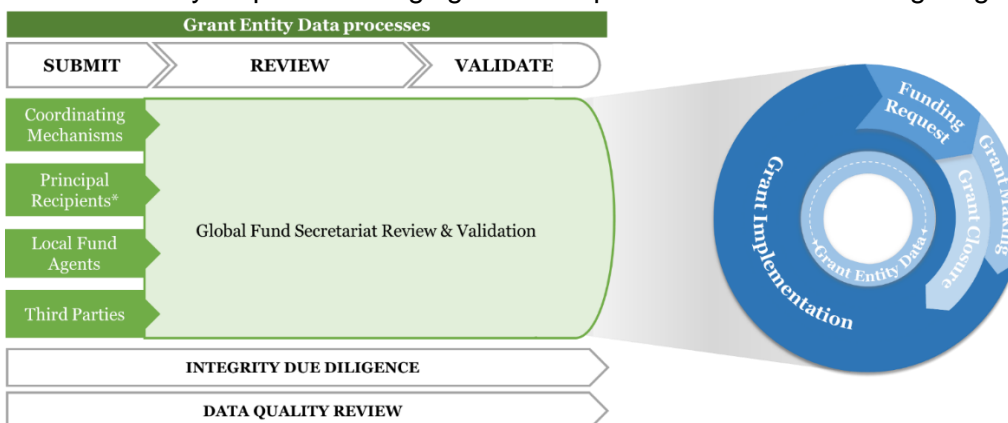
<sup>2</sup> Throughout this OPN, references to CM include any Country Coordinating Mechanism (with or without CCM Funding Recipient), Regional Coordinating Mechanism (RCM), Regional Organization (RO) or other applicants, as applicable. In addition, unless defined in this OPN or the context otherwise requires, all capitalized terms used in this OPN shall have the same meaning set out in the Global Fund Grant Regulations (2014). For terms not defined in the Global Fund Grant Regulations, please refer to Annex 1.

<sup>3</sup> And Lead Implementer (LI), if applicable. LI arrangements are only applicable where a government implementer (such as the Ministry of Health) is not mandated to sign Grant Agreements per national laws or other reasons. In such cases, the mandated Government entity (such as the Ministry of Finance or Ministry of Foreign Affairs) signs the Grant Agreement as PR with the Government implementer (such as the Ministry of Health) acting as LI to lead grant implementation. LI arrangements do not change or waive the accountability and responsibilities of the PR for implementation of the grant under the terms of the relevant Grant Agreement. The LI role must be clarified in the Grant Agreement such as in the grant budget's Summary Budget, if an LI has been selected for expenditure tracking purposes. Please consult with the Country Team Legal Counsel for appropriate wording to be included as an attachment to the Summary Budget.

GRANT ENTITY DATA				
	PR*	CM	LFA	Third Party
Organization Information	✓	✓	✓	✓
Banking Information	✓			✓
Contacts with Signatory Rights	✓	✓	✓	
Contacts with Notice Rights	✓		✓	
Contacts with GED Access Rights	✓	✓	✓	
Contacts with Grant Deliverables Access Rights (Editor / Submitter)	✓		✓	

\* And Lead Implementer if applicable (see footnote 3). The relevant GED for Lead Implementers are: Organization Information, Contacts with Notice Rights and Contacts with Access Rights. Lead Implementer GED are all non-Core GED.

4. The key steps for managing GED are presented in the following diagram:



\* And Lead Implementers, if applicable.

## Operational Policy

5. This Operational Policy Note (OPN) defines the principles, rules and requirements for the submission, review and validation, and data quality review of GED. It applies to country and multicountry portfolios and grants.

### 6. Guiding Principles

- i. **GED Responsibility and Accountability.** Grant Entities are the source of their respective GED<sup>4</sup>. They are responsible and accountable for the integrity and quality of the data that they provide to the Global Fund, which includes ensuring its accuracy, completeness and overall compliance with the requirements of this operational policy. Grant Entities are responsible for defining and creating<sup>5</sup>, updating and managing their own information. Global PRs<sup>6</sup> are also accountable for

<sup>4</sup> Under the Data Governance Committee Terms of Reference and the Information Data Regulations, these entities are the “Data Owners”.

<sup>5</sup> Except in cases defined in Submit GED section of this OPN.

<sup>6</sup> As defined in Annex 1.

both their headquarters and country-level GED.

- ii. **GED Protection and Privacy.** GED containing personal data<sup>7</sup> which is submitted to the Global Fund is processed and stored in accordance with the [Global Fund Privacy Statement](#) and the [Global Fund Personal Data Protection Regulations](#). These policies ensure the Global Fund abides by internationally recognized standards for protecting personal data. In turn, Grant Entities are responsible for processing personal data in compliance with the requirements on privacy and data protection contained in their contracts with the Global Fund.
- iii. **GED Use.** Grant Entity Data is used, among other things, for the execution, monitoring and reporting of grant life cycle processes. The [Global Fund Privacy Statement for Global Fund Grant Funding and Management Activities](#) provides details on the various purposes for which GED may be used.

#### A. SUBMIT GED

7. The timely creation and updating of GED is crucial to support end-to-end grant life cycle processes, from funding request development to grant closure. This avoids unnecessary delays in preparing and signing grants, processing annual funding decisions and disbursements, among others. Grant Entities must take note of the milestones listed in the respective grant life cycle Operational Policy Notes and Procedures and plan their GED creation or updates accordingly.
8. **Applicable Rules and Requirements.** All Grant Entities must ensure the quality of their GED (i.e. that all required information is complete and accurate with accompanying supporting documents) and that they comply with the applicable rules and requirements for creating and updating GED.
9. **Creation and Update.** Each Grant Entity owns and is responsible for creating or updating their GED. However, the Global Fund Secretariat undertakes the creation of new organization information in all cases as new organizations do not yet have access to the Global Fund Partner Portal.
10. Depending on the type, GED is created and updated through the Grant Operating System (GOS) GED Module, the Global Fund Partner Portal (GED Module) and/or the Global Fund System (GFS). Grant Entity Contacts with Access Rights to the Global Fund Partner Portal are required to enter a verification code when logging into the Global Fund Partner Portal (Multi-Factor Authentication) and must agree to the Partner Portal Terms of Use.

#### B. REVIEW AND VALIDATED GED

11. **Review.** All GED submitted by Grant Entities undergoes a review process by the Global Fund Secretariat to ensure appropriate checks have been performed on information to be used in grant life cycle processes. The Country Team may also ask the LFA to perform in-country verification of GED of PRs and CCM.
12. The review process focuses on ensuring data quality, specifically:
  - i. completeness of GED and supporting documents;

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<sup>7</sup> As defined in Annex 1.

- ii. accuracy of information against submitted supporting documents;
- iii. and compliance with the GED requirements defined in this OPN.

13. **Validation.** Based on the review, GED will be validated by the following before being reflected in Global Fund systems:

Entity	Grant Entity Data	Validation
<b>PR<sup>8</sup></b>	Organization Information	<i>Creation of new organization and update of official name:</i> Financial Services Team  <i>Other organization updates:</i> <ul style="list-style-type: none"> <li>○ <i>Regular PR:</i> Country Team – Fund Portfolio Assistant or Analyst (FPA) or Program Officer (PO)</li> <li>○ <i>Global PR:</i> PST Specialist or Associate Specialist</li> </ul>
	Banking Information	<i>Creation:</i> Finance Specialist or PST Specialist or Associate Specialist (Focused Portfolios and Global PRs)  <i>Update / deactivation:</i> Financial Services Team
	Contacts with Signatory Rights; Contacts with Notice Rights; and	Financial Services Team
	Contacts with GED Access Rights Contacts with Grant Deliverables Access Rights (Editor / Submitter)	<i>Regular PR:</i> Country Team – FPA or PO <i>Global PR:</i> PST Specialist or Associate Specialist
<b>CM</b>	Organization information	<i>Creation of a new CM organization and updates:</i> CCM Hub
	Contacts with Signatory Rights	<i>New Chair / Vice Chair / acknowledgment signatories and update of critical fields<sup>9</sup> for existing Chair / Vice Chair / acknowledgment signatories:</i> CCM Hub  <i>Update of existing Chair / Vice Chair / acknowledgment signatories without critical fields edited:</i> Country Team – FPA or PO
	Contacts with GED Access Rights	CCM Hub
<b>LFA</b>	Organization information	LFA Coordination Team

<sup>8</sup> And LI, if applicable. LI GED (Organization Information, Contacts with Notice Rights, Contacts with GED Access Rights and Contacts with Grant Deliverables Access Rights (Editors and Submitters) follows the validation process for Regular PRs.

<sup>9</sup> First Name, Last Name, Role, Recipient Status.

	Contacts with Signatory and Notice Rights	
	Contacts with GED Access Rights Contacts with Grant Deliverables Access Rights (Editor / Submitter)	
<b>Third Party</b>	Organization information	Financial Services Team
	Banking information	
	Relationship between PR and Third Parties	

### C. INTEGRITY DUE DILIGENCE

14. In parallel with the review and validation process described above, the Global Fund Secretariat screens all Grant Entities against (a) international terrorism and (b) sanctions lists. The due diligence review is focused on screening of organization, banking information and contacts data against these lists. The [Essential Due Diligence Procedure](#) provides an overview of the process.

### D. DATA QUALITY REVIEW

15. **Data Quality.** To ensure data quality, Grant Entities must undertake a regular (at least annual) comprehensive review and clean-up of their GED focusing on ensuring completeness, accuracy and compliance with GED requirements as well as removing duplicate records or outdated GED. In addition, the Global Fund will carry out a regular data check and cleansing exercise.

16. **Deactivate GED.** Where a GED record has expired or is no longer valid, it will be deactivated and archived by the Global Fund in accordance with the applicable [Global Fund regulations on information and data \(as amended from time to time\)](#). Depending on the type of GED, the deactivation process can be initiated by Grant Entities.

## 1) Specific Multicountry Considerations

17. The standard approach defined above also applies to multicountry portfolios and grants. The Global Fund's Portfolio Services Team (PST) is responsible for the internal review of GED relating to Global PRs.

## Annex 1. Definition of Terms

1. **Third Party Organization (Third Party):** A Supplier of services or goods who may receive direct disbursements of Grant Funds from the Global Fund. The Direct disbursements may either be requested by the PR or mandated by the Global Fund Secretariat in accordance with the OPN on Annual Funding Decisions and Disbursements<sup>10</sup>.
2. **Global PRs:** refer to (i) all “United Nations” organizations, and (ii) “other Multilateral Organizations”, “International Non-Government Organizations” and “International Faith-based Organizations” implementing in more than one country or multicountry.
3. **Organization information:** refers to information about the organization to be captured in the legally-binding documents for the successful execution of grant lifecycle processes (such as official name, address and legal / disbursement signatories).
4. **Banking Information:** provides details of the bank account that will be used to receive disbursements from the Global Fund (such as Bank Account Number, Account Holder Name, Legal Owner of the Bank account, SWIFT/ABA (where applicable) and IBAN (where applicable)).
5. **Contacts with Signatory Rights:** refer to persons that are duly authorized by the organization to sign or acknowledge legally-binding documents and/or to sign disbursement requests.
6. **Contacts with Notice Rights:** refer to the persons that will serve as the contact point for Global Fund notices regarding contractual matters (as per the terms of the relevant Grant Agreement) and/or grant or portfolio-specific correspondences.
7. **Contact with GED Access Rights:** refers to the person that will have access to the Global Fund Partner Portal to manage GED.
8. **Contact with Grant Deliverables Access Rights – Editor<sup>11</sup>:** Contacts responsible for accessing, completing, and attaching grant deliverables (e.g., grant-making, pulse checks, PU/DRs) and any supporting documents through the Partner Portal. Editor rights are assigned per grant / portfolio<sup>12</sup>, and one contact can be Editor for either one or multiple grants / portfolios.
9. **Contact with Grant Deliverables Access Rights – Submitter<sup>13</sup>:** Contacts responsible for submitting grant deliverables (e.g., grant-making, pulse checks, PU/DRs) to the Global Fund through the Partner Portal, in addition to having Editor rights (access, complete and attach).
10. **Personal Data:** means any information relating to a natural person who can be identified by such data, from such data and other information, or by means reasonably likely to be used related to such data. This can include biographical data, such as name, sex, marital status, date and place of birth, country of origin, country of asylum, individual registration number, identification number, occupation, religion, ethnicity, sexual orientation, biometric data such as a photograph, fingerprint, facial or iris image, location data, an online identifier, or information that is linked specifically to the physical, physiological, genetic, mental, economic, cultural or social identity of the person.

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<sup>10</sup> See link to Operational Policy Manual: [https://www.theglobalfund.org/media/3266/core\\_operationalpolicy\\_manual\\_en.pdf](https://www.theglobalfund.org/media/3266/core_operationalpolicy_manual_en.pdf).

<sup>11</sup> Editors are expected to be PR staff and LFA members who work on Global Fund grant deliverables, such as PR specialists in public health, finance or procurement & supply chain management or disease managers responsible for overseeing specific grants, and LFA team members.

<sup>12</sup> PR roles are assigned per grant, LFA roles per portfolio.

<sup>13</sup> Submitters are expected to be those PR staff and LFA members with authority to submit final grant deliverables to the Global Fund, such as the PR program or grant manager, or LFA focal point.