

16. Safeguards: Displacement and Resettlement

Yes. Where relevant, APMT Fiji maintains resettlement strategies and plans consistent with applicable local laws and our ISO-aligned Integrated Management System.

Fully informed participation evidence of systems and measures:

- **Early, plain-language consultation** (public notices, info sheets, community meetings in accessible venues/languages).
- **Documented engagement** (attendance registers, minutes, translated materials, visual maps/layouts).
- **Consent & representation** (time for feedback, ability to nominate community reps/seek independent advice).
- **Grievance Redress Mechanism** with clear timelines, escalation steps, and written outcomes.
- **Proportionate Social Impact Screening** and, if triggered, a Resettlement Action Plan (RAP) covering eligibility, entitlements, livelihood restoration, timelines, and monitoring.
- **Monitoring & reporting** (indicator-based tracking, management review, and corrective actions).

Supporting documents available on request: consultation plans and materials, meeting minutes/photos, GRM register, social impact assessments, RAP (if applicable), and monitoring reports.

You said:

Does the organisation have appropriate environmental and social safeguards in place? Evidence of environmental management and social (e.g. disability, fully informed participation) principles and plans and monitoring activities

Yes. APMT Fiji has **environmental and social safeguards** embedded in its ISO-aligned Integrated Management System (ISO 9001 & ISO 21001 principles; good-practice alignment to ISO 14001). These controls apply to our campuses, training sites, placements, and projects.

What's in place

- **Policies & governance:** Environmental & Social (E&S) Policy; Code of Conduct; Child Protection & PSEAH; WHS; Procurement (ethical & sustainability clauses); Grievance Redress Mechanism (GRM).
- **Risk screening & planning:** Project-level E&S Risk Screening Checklist; Legal/permits register; where triggered, Environmental Management Plan (EMP) / ESMP and, if required by law, EIA.
- **Operational controls (environment):** Waste segregation & licensed disposal, hazardous substances (SDS, storage), energy/water efficiency, noise/dust controls for works, spill response, contractor E&S requirements and permits.
- **Social safeguards:**

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- **Disability inclusion: Disability Inclusion Action Plan (DIAP)**, accessibility audits (ramps, signage, WASH), reasonable adjustments in training/assessment, UDL principles.
- **Fully informed participation:** Stakeholder Engagement Plan (SEP) with plain-language materials, translated notices, attendance registers/minutes, documented feedback loops.
- **Safeguarding:** Child Protection & PSEAH standards; vetted staff/contractors; school and workplace briefings.
- **Contractor/partner controls:** Pre-qualification on E&S capacity, COI and sanctions checks, flow-down clauses, site inductions, SWMS/WSMP for construction-like work, performance scorecards.

Monitoring & evidence (available on request)

- **Monitoring plans & KPIs:** waste volumes, energy/water use, incident/near-miss rates, accessibility actions closed, stakeholder engagement completed vs plan, grievance resolution times.
- **Records:** EMP/ESMP, inspection checklists, training logs, GRM register, stakeholder minutes/photos, accessibility audits, contractor compliance reports, internal audit reports, CAPA register, Management Review minutes.

17. Safeguards: Environmental and Social

Short statement for forms:

“APMT maintains documented environmental and social safeguards—including risk screening, EMP/ESMP where required, disability inclusion measures, fully informed community participation, and a time-bound GRM—with ongoing monitoring, internal audits, and management review to ensure compliance and continual improvement.”

You said:

Are appropriate filing/record management systems in place across the organisation? Evidence of how documents are retained and stored, e.g. document retention policy; cloud-servers

ChatGPT said:

Yes. APMT Fiji maintains organisation-wide, ISO-aligned filing and records management systems that control the **creation, retention, access, protection, retrieval, and disposal** of documents and data.

How it works (ISO 9001 & ISO 21001 – cl. 7.5 Documented Information)

- **Records Governance & Policy**
 - *PR-REC-01 Records Control Procedure* and *APMT Information Management & Privacy Policy* define record classes, owners, retention periods, access levels, and disposal methods.
 - **Records Officer (system owner)** and **Data Stewards** in each function (HR, Finance, Academic, WHS).

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- **Storage Architecture**
 - **Secure cloud repositories** (role-based access, version control, audit trails) for master documents and operational files.
 - **Read-only archives** for approved records; e-signature support for controlled approvals.
 - **Local scan-to-cloud** for paper capture using approved naming conventions and metadata tags.
- **Retention & Disposal**
 - **Retention Schedule** mapped to legal/contractual requirements (e.g., finance, student records, HR, WHS, safeguarding).
 - **Disposition workflow:** review → approval → secure destruction (digital wipe/certified shred) with a Certificate of Destruction logged.
 - Litigation hold capability for investigations/audits.
- **Security & Continuity**
 - **Least-privilege access** (RBAC), MFA, and encryption at rest/in transit.
 - **Backups** with tested restore procedures and geographically separated redundancy.
 - **Change control & versioning:** only controlled copies used for operations; superseded versions archived.
 - **Incident & breach response** integrated with privacy/WHS/IT procedures.
- **Findability & Quality**
 - Standard **file plan & naming conventions**; mandatory metadata (doc type, owner, date, version).
 - **Searchable indexes** and **registered master list** of controlled documents.
- **Monitoring & Assurance**
 - **Quarterly spot checks** for file completeness, access accuracy, and retention compliance.
 - **Internal audits** (ISO cl. 9.2) sample high-risk record sets; nonconformities go to the **CAPA register**; effectiveness verified.
 - **Management Review** receives KPIs (see below) and approves improvements.

KPIs (evidence of implementation)

- % critical records present & complete (by function)
- % documents with correct metadata/versioning
- Backup restore test pass rate & time-to-restore
- % scheduled disposals completed with certificates

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- Number of improper-access exceptions closed

Evidence available to reviewers (on request)

- Records Control Procedure (*PR-REC-01*), Retention Schedule, and Controlled Document Register
- Access/RBAC matrix, MFA policy, and audit trail exports
- Backup/restore test reports, Certificates of Destruction
- Internal audit reports, CAPA log, and Management Review minutes
- Example controlled files (policies, contracts, student records) showing version history and approvals

One-line statement for forms/web:

“APMT operates documented, secure cloud-based records systems with defined retention schedules, role-based access, version control, encryption, backups, and audited disposal—monitored through internal audits and management review in line with ISO 9001/21001.”

You said:

How will the organisation ensure it meets the record keeping obligations in the contract? Evidence of how documents are retained and stored, e.g. document retention policy; cloud-servers

Record Management/Administration

18. How APMT will ensure it meets contract record-keeping obligations

Short statement (for forms):

“APMT maintains a documented Records Control Procedure, contract-specific retention schedules, and secure cloud repositories with role-based access, version control, and audit trails. We map each contract’s record-keeping clauses to our retention schedule, monitor compliance through internal audits, and provide verified evidence upon request.”

Governance & Mapping

- **Contract Register & Obligations Matrix:** Each contract is reviewed on intake; record-keeping clauses (scope, formats, retention years, audit rights, confidentiality, privacy) are mapped to our Retention Schedule and labelled in the file plan.
- **Records Owner assigned:** A named Data Steward in the relevant function (e.g., Projects, Finance, Academic) is accountable for completeness and timeliness.
- **Documented Procedure:** *PR-REC-01 Records Control*—creation, classification, retention, access, storage, retrieval, disposition, and hold orders.

Storage & Security (cloud servers)

- **Secure cloud repositories** (role-based access/MFA, encryption in transit & at rest, version control, immutable audit trails).
- **Standardised file plan & naming** with contract ID tags and metadata (owner, retention, confidentiality level).

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- **Backups & restore tests** performed per schedule; geographically separated redundancy.

Retention, Access & Disclosure

- **Contract-specific retention periods** recorded in the metadata (e.g., “Contract X: 7 years after closeout”).
- **Access control:** least-privilege RBAC; supplier/partner access only via approved shared spaces with time-bounded permissions.
- **Disclosure management:** controlled exports for audits or reports; logs retained as evidence of what was shared and when.

Quality Assurance & Monitoring

- **Quarterly compliance checks:** completeness, correct metadata, access accuracy, retention status.
- **Internal audits (ISO cl. 9.2):** sampling against the Obligations Matrix; non-conformities enter the **CAPA** register with due dates and effectiveness checks.
- **Management Review (annual):** KPIs, audit outcomes, legal/contract changes and resource needs.

Change & Close-Out

- **Change control:** if a contract is amended, the Obligations Matrix and metadata are updated; staff notified.
- **Contract close-out pack:** verifies required records, transfers archives to read-only, and schedules disposition dates.
- **Disposition & holds:** secure destruction only after retention lapses and no active legal/contractual holds; Certificates of Destruction filed.

Privacy, Security & Incident Response

- **Privacy by design:** data minimisation, approved locations, and purpose limitation per contract.
- **Incident response:** documented process for suspected breaches, with notification timelines aligned to the contract and law.

KPIs (evidence of implementation)

- % contract files with complete Obligations Matrix and correct metadata
- Backup restore test pass rate & recovery time
- % scheduled retentions/disposals completed with certificates
- of improper-access exceptions identified/closed
- Audit findings closed on time

Evidence available on request

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- *PR-REC-01 Records Control Procedure* and Retention Schedule (with contract mappings)
- Contract Obligations Matrix sample; Controlled Document Register
- Access/RBAC matrix, MFA policy, audit-trail exports
- Backup/restore test reports; Certificates of Destruction
- Internal audit reports, CAPA logs, Management Review minutes
- Example contract folder showing version history, approvals, and disclosure logs

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