

APMT Fiji Conflict of Interest (COI) Policy

Aligned to ISO 21001:2018 (Educational Organizations Management Systems) & ISO 9001:2015 (Quality Management Systems)

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Version: 1.0

Effective: 01 Jan 2025

Next Review: 12 months from effective date

Owner: Integrity & Compliance Officer (ICO)

Approved by: CEO

Applies to: All APMT Fiji staff, officers, volunteers, board/committee members, contractors, agents, suppliers, partners and sub-grantees.

1) Purpose & Scope

This policy sets out APMT's framework to **identify, disclose, manage and monitor** Conflicts of Interest (COIs) to protect the integrity of decisions in education delivery, recruitment, procurement, grants/sub-grants, student assessment/certification, and partnerships. It forms part of APMT's integrated QMS/EOMS and supports the principles of impartiality, transparency, risk-based thinking and continual improvement.

2) Definitions (plain language)

- **Conflict of Interest (COI):** a situation in which personal interests (financial, familial, relational or other) **could improperly influence** one's duties. Includes **actual** (present), **perceived** (appears to influence), and **potential** (could arise in future) conflicts.
- **Related Party:** spouse/partner, immediate/extended family, close friend, or entity in which the individual has a significant role/interest.
- **Recusal:** removal from discussion/decision-making to eliminate influence.
- **Decision-making Activity:** recruitment/selection, tender/evaluation/award, grant/sub-grant decisions, assessment/validation, certification, disciplinary or performance decisions.

3) Policy Statement

- APMT maintains a **formal COI Policy** (this document) and embeds COI controls across all decision-making processes.
- All personnel and downstream parties must **proactively declare** COIs **before** participating in relevant activities and **immediately** when a COI arises.
- APMT ensures **transparent recruitment** and **fair procurement** by mandating COI disclosures, recusals and independent review where needed.
- Breaches of this policy constitute misconduct under the **Code of Conduct** and may result in disciplinary action, up to termination of employment/contract or debarment.

4) Principles (ISO 21001 & ISO 9001)

- **Impartiality & Integrity:** decisions are evidence-based and free from undue influence.

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- **Transparency & Accountability:** disclosures, recusals and decisions are recorded and auditable.
- **Risk-based Controls:** depth of controls proportionate to risk (e.g., high-value procurements).
- **Competence & Awareness:** targeted COI training within 30 days of start and annually thereafter.
- **Continual Improvement:** audits, incident reviews and management reviews drive updates to the COI framework.

5) Roles & Responsibilities

- **Board/CEO:** approve policy; foster tone-at-the-top; oversee annual COI attestations.
- **Integrity & Compliance Officer (ICO):** policy owner; maintain **COI Register**; provide guidance; conduct spot checks/audits; escalate non-compliance.
- **Managers/Chairs (panels/committees):** collect COI forms before meetings/activities; enforce recusals; ensure minutes reflect COI management.
- **All Personnel/Downstream Parties:** disclose COIs; avoid activities where conflicts exist until mitigations are applied; complete training; report concerns.

6) Mandatory Disclosures & Attestations

- **Onboarding:** COI Declaration submitted before access to decision-making activities.
- **Annual:** all relevant personnel complete an **Annual COI Attestation**.
- **Event-based:** new COIs declared **immediately** when they arise (e.g., a relative applies for a role; a supplier offers hospitality).

7) COI Management Process (Procurement, Recruitment, Grants & Academic Decisions)

Step 1 — Identify: Prior to each activity, the Chair/Manager issues a COI reminder and collects signed COI forms from all participants.

Step 2 — Assess: ICO/Chair categorises the COI (actual/perceived/potential) and risk level.

Step 3 — Treat: One or more of the following:

- **Recusal** from all discussion/evaluation/approval stages;
- **Independent reviewer** added;
- **Role reassignment** (e.g., observer only);
- **Information barriers** (no access to tenders/applicant data);
- **External oversight** (for high-risk/high-value decisions).

Step 4 — Record: Minutes and the **COI Register** capture declarations, treatments and decision outcomes.

Step 5 — Monitor: Spot checks and post-award audits verify adherence; non-compliance triggers corrective action.

7.1 Procurement (including sub-grants)

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- COI declarations are **mandatory** for all requisitioners, evaluators and approvers prior to RFX issuance and evaluation.
- Any relationship with bidders must be disclosed; conflicted persons are recused; evaluation scoring sheets note recusals; decisions are minuted.
- Contracts include integrity clauses and audit rights; suppliers must also disclose COIs within their organisations and **flow-down** the requirement to lower tiers.

7.2 Recruitment & HR Decisions (Transparent Recruitment)

- Job advertisements and selection criteria are published where practicable.
- Shortlisting and interviews follow structured rubrics; at least two evaluators; panel members complete COI declarations.
- Candidates must disclose COIs (e.g., relatives at APMT); conflicted panelists are recused.
- Decision memos and COI records are retained per the Records Schedule.

7.3 Grants/Sub-grants & Scholarships

- Pre-award due diligence includes COI checks for reviewers and applicants.
- Grant agreements require partners to maintain their own COI policies or adopt APMT's and to **report any COIs** without delay.
- Where partners lack a formal policy, APMT issues a **COI Disclosure Addendum** and provides training/briefing before funds are disbursed.

7.4 Academic Assessment/Certification

- Assessors, validators and moderators must declare COIs related to learners/employers.
- Where conflicts exist, an alternate assessor/moderator is appointed.

8) Code of Conduct Linkage & Misconduct

- APMT's **Code of Conduct** sets behavioural expectations **inside and outside the workplace** and describes consequences for breaches (counselling, warnings, dismissal, contract termination).
- COI non-disclosure or attempted concealment is treated as a serious breach.

9) Gifts, Hospitality, Donations & Sponsorships

- All offers must be recorded in the **Gifts & Hospitality Register**; prior approval is required above the threshold. Offers from active/prospective suppliers or applicants must be **declined** and reported to the ICO.

10) Training & Awareness

- **Documented training** at induction and annually; tailored micro-modules for procurement, recruitment, grants and academic staff; practical case studies; comprehension checks.
- Downstream parties receive COI briefings and template forms during onboarding.

11) Records & Privacy

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- ICO maintains the **COI Register**, Gifts & Hospitality Register, annual attestations, and meeting minutes showing recusals.
- Records are retained per schedule and handled under Data Protection requirements.

12) Monitoring, Audit & Improvement

- COI controls are subject to internal audits and management review.
- Metrics: % staff attested, # recusals, audit findings, time-to-closure of corrective actions.
- Lessons learned drive updates to procedures, forms and training.

13) If No Policy Existed — Interim Measures (Regulatory Q&A)

(For disclosure when responding to external questionnaires where an entity lacks a formal policy. Not applicable to APMT once this policy is approved.)

- Require **COI declarations** for all procurement, recruitment and grant decisions;
- Mandate **recusals** and independent oversight;
- Record outcomes in minutes and maintain a **temporary COI log**;
- Provide **briefing notes/training** to staff and partners;
- Commit to approving a formal policy and embedding it in Finance/Operations manuals within 60 days.

14) Quick Answers to the Questionnaire (for donors/regulators)

- **Does the organisation have a Conflict-of-Interest policy?** Yes—this policy (APMT-POL-COI-001).
- **If 'No', what steps...?** See Section 13 for interim measures.
- **Does the organisation ensure staff recruitment is transparent?** Yes—see Section 7.2 (transparent advertising, structured evaluation, COI declarations, documented decisions).
- **Does the organisation have a Code of Conduct...?** Yes—the Code sets expectations inside/outside the workplace and consequences for breaches; COI violations constitute misconduct (Section 8).

15) Related Policies & Procedures

- Integrity, Anti-Fraud/Bribery/Corruption Policy
- Procurement Policy & Procedure; Grants/Sub-grants Procedure
- HR & Recruitment Policy; Disciplinary Procedure
- Academic Integrity & Assessment Policy
- Data Protection & Records Management Policy
- **Forms:** FM-COI-01 Conflict of Interest Declaration; FM-GHR-01 Gifts & Hospitality Register; COI Meeting Minute Template

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