

APMT Fiji Employee Code of Conduct

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

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Version: 1.0

Applies to: All APMT Fiji personnel (employees, trainers/assessors, casuals, volunteers), directors, contractors, agents, partners and sub-grantees while acting for or representing APMT Fiji ("APMT").

Approved by: CEO

Effective date: 01 Jan 2025

Next review: 12 months

1) Purpose and Scope

APMT is committed to a safe, respectful and ethical environment for learners, staff, partners and the community. This Code defines **expected behaviours inside and outside the workplace** whenever a person's actions could reasonably reflect on APMT, and the **consequences** for breaches.

This Code is part of APMT's Integrated Management System and supports ISO 9001/21001 requirements for leadership, competence, awareness, communication, risk control and continual improvement.

2) Principles

1. **Integrity & Lawfulness** — act honestly, comply with applicable laws and APMT policies.
2. **Respect & Inclusion** — treat everyone with dignity; no discrimination, bullying or harassment.
3. **Safety & Wellbeing** — uphold WHS obligations; stop unsafe work; report hazards and incidents.
4. **Learner-Centred Practice** — safeguard learners, protect academic integrity, ensure fair assessment.
5. **Accountability & Transparency** — declare conflicts, keep accurate records, use resources responsibly.
6. **Confidentiality & Privacy** — protect personal and sensitive information.
7. **Impartiality** — decisions based on merit; no bribery, facilitation payments or improper influence.
8. **Professionalism** — maintain competence, avoid conduct that damages trust in APMT.

3) Expected Behaviours

3.1 Professional Conduct (on- and off-duty)

- Maintain courteous, culturally sensitive conduct; avoid language or behaviour that is abusive, intimidating, discriminatory or sexually inappropriate.
- Do not engage in conduct (including online) that could reasonably **bring APMT into disrepute**.
- Wear/maintain appropriate attire and ID when on duty or representing APMT.

3.2 Respect, Inclusion, Anti-Bullying/Harassment

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- Zero tolerance for bullying, harassment, sexual harassment, victimisation, discrimination (e.g., gender, race, religion, disability, age).
- Report incidents immediately to a manager or via confidential channels.

3.3 Health, Safety and Environment (WHS)

- Follow safe work procedures; use PPE; report hazards/near misses; only operate equipment if trained/authorised.
- No drugs or alcohol at work or when representing APMT (except responsible alcohol at authorised events). Never work impaired.

3.4 Learner Safeguarding & Boundaries

- Maintain **clear professional boundaries**; no romantic/sexual relationship with a current learner or any relationship that compromises impartiality.
- Report child protection or vulnerable-person concerns immediately (and externally where required by law).

3.5 Academic Integrity & Assessment

- No plagiarism, cheating facilitation, ghost writing or falsification of assessment or attendance records.
- Assessments must be fair, valid and timely; apply reasonable adjustments consistently and record decisions.

3.6 Conflicts of Interest (COI)

- Disclose any real, potential or perceived COI **before** participating in decisions (recruitment, procurement, assessment, certification).
- Follow mitigation (e.g., recusal) as approved; non-disclosure is misconduct.

3.7 Anti-Fraud, Bribery & Corruption; Gifts & Hospitality

- Never solicit/accept bribes, kickbacks, facilitation payments or any benefit intended to influence.
- Gifts/hospitality must be modest, infrequent and recorded in the **Gifts Register**; never accept during active tenders or assessments.
- Follow APMT-POL-IFC-001 and related procedures.

3.8 Use of Property, Finances & Information

- Use APMT assets (IT, tools, vehicles, funds, purchasing cards) only for authorised purposes; keep accurate records; no unauthorised removal or personal gain.
- Protect confidential/business information; comply with privacy law and data retention schedules.

3.9 Social Media & Public Statements

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- Be respectful, factual and lawful.
- Do not disclose confidential information or speak on behalf of APMT unless authorised.
- Personal posts must not imply APMT endorsement or damage APMT's reputation.

3.10 Outside Employment, Political Activity and Gifts from Learners

- Notify HR of outside employment that could conflict with APMT duties.
- Political activity must be clearly personal, outside work hours and without APMT resources.
- Avoid gifts from learners/clients; if culturally sensitive, declare and record per Gifts procedure.

3.11 Sanctions/ATF and Third-Party Conduct

- Comply with sanctions and counter-terrorism financing safeguards; cooperate with screening.
- Ensure subcontractors/agents you manage are aware of and comply with this Code.

4) Responsibilities

All Personnel

- Read, understand and **acknowledge** this Code at induction and annually.
- Complete mandatory training; report suspected breaches immediately and in good faith.

Managers

- Model the Code; ensure staff understand obligations; manage COIs; respond to reports promptly; record actions.

Integrity & Compliance Officer (ICO)

- Maintain Code, registers (COI, Gifts), integrity training, triage investigations, track corrective actions.

HR

- Embed Code into recruitment, induction, performance and grievance processes; maintain records.

5) Speaking Up (Reporting) & Protection

- Report concerns to: your manager, HR, ICO, CEO, or via confidential email/hotline (see intranet).
- **Anonymous reports** accepted where lawful.
- **No retaliation** against good-faith reporters or witnesses. Retaliation itself is a breach.

6) Breach Management & Consequences

6.1 Process

1. **Triage** by ICO/HR; assess risk and immediate controls.

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2. **Investigation** by an impartial person, respecting procedural fairness and confidentiality.
3. **Outcome & Actions** documented; parties informed to the extent lawful.
4. **Corrective/Preventive Actions** raised in CAPA register; effectiveness verified.
5. **External Reporting** to regulators/law enforcement/funders where required.

6.2 Consequences (indicative matrix)

- **Minor breach** (e.g., first-time lapse in courtesy): coaching, written warning, refresher training.
- **Serious breach** (e.g., harassment, COI non-disclosure affecting a decision, data/privacy breach, academic misconduct): formal warning, role restrictions, suspension, termination; potential reporting to authorities.
- **Gross misconduct** (e.g., fraud, theft, bribery, assault, child/vulnerable person risk, intentional falsification): summary dismissal, referral to police/regulators, recovery of losses, supplier/agent termination/debarment.
- Third parties (contractors/agents): **payment suspension, contract termination, debarment**, and recovery of damages per contract.

7) Training, Communication & Records

- **Induction** within 30 days; **annual refresher**; targeted modules for higher-risk roles (recruitment panels, procurement, assessors).
- Code available on website and intranet; posters in common areas.
- Records: acknowledgements, training completion, COI/Gifts registers, investigations and outcomes retained per Records Control Procedure.

8) Links to Policies & Procedures

- APMT-POL-IFC-001 Integrity, Anti-Fraud, Bribery & Corruption
- APMT-HR-001 HR & Recruitment Policy
- APMT-PROC-001 Procurement Policy
- PR-OPS-02 Assessment Validation & Moderation Procedure
- PR-OPS-01 Complaints & Appeals Procedure
- PR-REC-01 Records Control Procedure
- PR-AUD-01 Internal Audit Procedure
- PR-SAN-01 Sanctions/ATF Screening Procedure
- WHS Policy and Emergency/Critical Incident Procedures

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