

APMT Fiji — Integrity, Anti-Fraud, Bribery & Corruption Policy

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

Document ID: APMT-POL-IFC-001

Version: 1.0

Applies to: All APMT Fiji staff, contractors, volunteers, agents, partners, and sub-grantees

Approved by: CEO

Effective date: 01 Jan 2025

Next review: 12 months

1) Purpose and Scope

APMT Fiji (“APMT”) is committed to the highest standards of integrity and accountability. This policy sets out our framework to prevent, detect, respond to, and remediate fraud, bribery, corruption, conflicts of interest, and sanctions/anti-terrorist financing (ATF) risks across all operations, including education delivery, procurement, grants/sub-grants, and recruitment.

This policy forms part of APMT’s Integrated Management System and is embedded into our ISO 9001 QMS and ISO 21001 EOMS through risk-based thinking, documented processes, competence and awareness, control of externally provided processes, performance evaluation, and continual improvement.

2) Definitions (plain language)

- Fraud: Any act of deception to obtain an unfair or unlawful gain (e.g., falsifying invoices, expense claims).
- Bribery: Offering, giving, receiving, or soliciting anything of value to influence a decision.
- Corruption: Abuse of entrusted power for private gain (e.g., kickbacks, nepotism).
- Conflict of Interest (COI): A situation where personal interests could improperly influence professional decisions.
- Sanctions/ATF: Laws and lists that restrict dealings with certain persons, entities, or countries to prevent terrorism financing and other crimes.
- Downstream parties: Subcontractors, delivery partners, agents, and sub-grantees engaged by APMT.

3) Policy Statement

1. Zero tolerance for fraud, bribery, and corruption.
2. No facilitation payments are permitted.
3. Gifts & Hospitality must be modest, infrequent, and never intended to influence; all offers (accepted or declined) are recorded in the register.
4. Conflicts of Interest must be declared, recorded, and managed before decisions are made.
5. Sanctions & ATF compliance is mandatory for APMT and all downstream parties.
6. Whistleblower protection: Reports made in good faith will be protected from retaliation.

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7. Consequences: Breaches may result in disciplinary action (including dismissal), contract termination, reporting to authorities, and recovery of losses.

4) Roles & Responsibilities

- Board/CEO: Approve policy; set tone at the top; ensure resources and independence for investigations.
- Integrity & Compliance Officer (ICO): Owns this policy; maintains registers; conducts screening, training, investigations, and reporting; coordinates improvements.
- People & Culture (HR): Ensures transparent recruitment, COI declarations, training records, and disciplinary processes.
- Procurement & Finance: Segregation of duties, due diligence on vendors/partners, financial controls, red-flag monitoring, and recordkeeping.
- Managers: Embed controls in local processes; ensure staff and contractors comply.
- All Personnel/Downstream parties: Complete training; declare COIs; follow this policy; report concerns immediately.

5) Preventive Controls (What we do to prevent issues)

5.1 Risk-based planning (ISO 9001/21001: planning & risk)

- Annual Integrity Risk Assessment covering fraud, bribery, corruption, sanctions/ATF, and COI risks for each activity (education delivery, procurement, grants, student services).
- Risk treatments mapped to processes, with owners and KPIs.

5.2 Segregation of duties & approvals

- No single person can request, approve, and pay a transaction.
- Approval thresholds for purchases, contracts, refunds, scholarships, and grant awards are documented.
- Mandatory three-way match (purchase order, delivery evidence, invoice) before payment.

5.3 Gifts, hospitality, donations & sponsorships

- Pre-approval required if estimated value exceeds FJD or could appear to influence a decision.
- All instances logged in the Gifts & Hospitality Register; ICO reviews quarterly.

5.4 Procurement & grants

- Competitive processes (minimum three quotes or tender) unless a documented, approved justification exists.
- Conflict of Interest Declarations from all panel members and decision-makers before evaluation.
- Due diligence (see §7.2) on suppliers and sub-grantees, including sanctions/ATF screening, beneficial ownership checks, and capability assessment.
- Anti-corruption and flow-down clauses mandatory in all contracts.

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5.5 Recruitment transparency

- Vacancies advertised (internal and/or external) with clear selection criteria.
- Structured scoring against predefined criteria; panel interviews where practicable.
- COI declarations by panel members before shortlisting.
- Reference and right-to-work checks and, where role-appropriate, criminal history checks.
- Decision rationale recorded in the Recruitment Decision Report; records retained per retention schedule.

5.6 Training & awareness

- Mandatory induction training on this policy within 30 days of start; annual refresher e-learning thereafter.
- Specialized training for higher-risk roles (procurement, finance, grants, international engagement).

6) Detection & Reporting and How we identify issues

- Multiple reporting channels: confidential email, hotline, and direct reporting to the ICO or CEO.
- Anonymous reporting permitted where allowed by law.
- Data analytics and red-flag monitoring (duplicate vendors, unusual payment patterns, round-sum invoices, out-of-hours approvals).
- Internal audits and spot checks on high-risk processes and projects.
- Supplier/partner attestations to confirm continuing compliance.

7) Response & Investigation (How we manage issues)

7.1 Triage & investigation

- The ICO logs every report, conducts an initial assessment within 5 business days, and appoints an impartial investigator.
- Investigations follow a documented procedure ensuring fairness, confidentiality, and chain-of-custody for evidence.

7.2 Corrective actions & remediation (ISO 9001/21001: non-conformity & improvement)

- Where substantiated, actions may include: dismissal, contract termination, supplier debarment, recovery of funds, process fixes, and required re-training.
- Root-cause analysis completed; Corrective Action Plans tracked to closure and effectiveness verified.

7.3 External reporting

- Where required, APMT will report to relevant authorities/regulators and inform funders/partners per contract terms.

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8) Sanctions & Anti-Terrorist Financing (ATF) Safeguards

8.1 Screening scope

- APMT screens itself, its parent/subsidiaries (where applicable), key personnel, students on scholarships, suppliers, subcontractors, agents, and sub-grantees against applicable national and international sanctions/ATF lists (e.g., UN, EU, US, AU, and Fiji authorities), as relevant to our operations and funding obligations.

Note: This policy defines the process. APMT does not make blanket public assertions about its or others' list status; instead, we evidence screening outcomes at the time of engagement and periodically thereafter.

8.2 When screening occurs

- Pre-engagement (before onboarding).
- Periodic re-screening at least annually and upon trigger events (ownership change, adverse media, scope expansion, new award).
- Payment holds if new hits or credible adverse findings emerge.

8.3 Escalation

- Any potential match is escalated to the ICO, who conducts secondary verification and documents the decision and rationale.
- Business with a confirmed restricted party is prohibited unless a lawful license/waiver exists; CEO approval and legal advice are mandatory in such cases.

9) Integrity Systems for Conflicts of Interest

- COI policy: Everyone must declare, record, and manage any real, potential, or perceived COI before participating in decisions (procurement, recruitment, grants, assessments, certification).
- Registers: The ICO maintains a COI Register and reviews it quarterly.
- Mitigations: Recusal from decisions, independent review, change of role, or removal from the activity.
- Non-disclosure of a COI is a disciplinary matter.

10) Subcontractors, Partners & Sub-grantees (How we ensure they comply)

1. Pre-award due diligence: capability, integrity history, beneficial ownership, sanctions screening, references, and financial health.
2. Contractual clauses: mandatory compliance with this policy, audit/inspection rights, data protection, anti-bribery warranties, flow-down to any lower-tier partners.
3. Kick-off briefing: provide policy pack; confirm named integrity focal point; agree reporting lines and KPIs.

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4. Monitoring: periodic reports, spot checks, document sampling, and (where risk warrants) on-site reviews.
5. Capacity building: targeted training and corrective-action support where gaps are identified.
6. Attestations: annual compliance certifications and disclosure of any integrity incidents.
7. Enforcement: payment suspension, remediation plans, or termination for breach; report to relevant authorities if required.

11) Records, Performance & Continual Improvement

- Records: screening results, COI forms, gifts register, training logs, due-diligence files, investigation files, approvals, and audit reports retained per the Records Control Procedure.
- KPIs: training completion rates, time to triage, number of substantiated cases, corrective-action closure time, supplier due-diligence coverage, re-screening completion, and audit findings.
- Management review: KPIs and incident trends reported at least annually to the Executive; actions tracked to closure.
- Improvement: lessons learned integrated into processes, templates, and training content.

12) Recruitment Transparency (Summary of Measures)

- Published selection criteria; structured shortlisting; panel interviews where practicable.
- Panel COI declarations logged before evaluation.
- Documented scoring matrix; decision memo stating reasons for selection/non-selection.
- Verified references and right-to-work; role-based background checks.
- Candidate feedback on request, subject to privacy laws.

13) Related Procedures & Templates (Annexes)

- PR-IFC-01: Fraud, Bribery & Corruption Response Procedure
- PR-SAN-01: Sanctions & ATF Screening Procedure
- PR-PRC-01: Procurement & Grant-Making Procedure
- PR-HR-01: Transparent Recruitment Procedure
- FM-COI-01: Conflict of Interest Declaration
- FM-GHR-01: Gifts & Hospitality Register
- FM-DD-01: Third-Party Due Diligence Checklist
- FM-REP-01: Integrity Incident Report Form

14) Communication & Acknowledgment

This policy is published on www.apmt.com.fj and the staff intranet. All personnel and relevant downstream parties must sign an acknowledgment at onboarding and annually thereafter.

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Quick Answers to the Specific Questions

Q1. What policies are in place to deal with fraud, bribery, and corruption prevention and management?

This policy (APMT-POL-IFC-001), supported by procedures PR-IFC-01, PR-PRC-01, PR-SAN-01, PR-HR-01, and the Gifts/COI frameworks.

Q2. What measures ensure effective implementation?

Risk assessments, segregation of duties, mandatory training, sanctions/ATF screening, transparent procurement and recruitment, audits, monitoring KPIs, incident reporting & investigations, corrective actions, management review, and continual improvement.

Q3. How do subcontractors/sub-grantees adhere to APMT's policies?

Through pre-award due diligence, mandatory contract clauses and flow-down, induction/training, periodic attestations and monitoring, audit rights, and enforcement (including payment suspension or termination).

Q4. Safeguards: Anti-Terrorist Financing and Sanctions

APMT screens itself and all downstream parties against applicable sanctions lists at onboarding and annually, with escalation and prohibition rules for confirmed matches (see §8).

Q5. Integrity Systems Checks/ Conflict of Interest

APMT operates a formal COI policy and register; declarations are required before any procurement, recruitment, grant, or assessment decision; mitigations are enforced (see §9).

Q6. Transparent Recruitment

Structured, criteria-based selection; panel interviews; COI declarations; documented scoring; reference/right-to-work checks; and retained records (see §12).

Statement of Alignment

This policy operationalizes ISO 9001 and ISO 21001 requirements by:

- applying risk-based thinking and documented processes (Clauses 4–8),
- ensuring competence, awareness, and communication (Clause 7),
- controlling externally provided processes (Clause 8),
- conducting performance evaluation and internal audit (Clause 9), and
- driving corrective action and continual improvement (Clause 10).

Approval & Control

- Owner: Integrity & Compliance Officer
- Change history: v1.0 – Initial issue to integrate anti-fraud, bribery, corruption, sanctions/ATF, COI, and recruitment transparency into QMS/EOMS.

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