

Integrity Systems Checks (ISO-Aligned)

1. Purpose

To ensure APMT prevents, detects, and responds to integrity risks in recruitment, procurement, grants, and daily operations through documented controls, clear accountability, and verifiable records.

2. Scope

All APMT personnel (employees, contractors, volunteers), committees, suppliers, agents, and sub-grantees, across all locations.

3. Normative references

- ISO 9001:2015 – Quality management systems
- ISO 21001:2018 – Educational organizations management systems
- ISO 37301:2021 – Compliance management systems
- ISO 37001:2016 – Anti-bribery management systems

4. Roles and responsibilities (RACI)

- **Board/CEO** – Approve policies; receive protected disclosures (R)
- **Integrity & Compliance Officer (ICO)** – Operate the system, investigations, reporting (A)
- **People & Culture (P&C)** – Recruitment screening, training records (R)
- **Procurement Lead** – COI collection & vendor due diligence (R)
- **All Personnel** – Disclose COI; comply with Code; complete training (R)

5. Core Controls Checklist (with Procedures & Evidence)

Use the following table as your internal audit checklist each quarter and at every hiring/procurement cycle.

Control Area	What “Good” Looks Like (ISO-Aligned Requirement)	Procedure (How APMT Does It)	Evidence to Keep	Owner	Frequency	If “No”, Required Corrective Action
5.1 Conflict-of-Interest (COI) Policy	A current, Board-approved COI policy defines COI, disclosure triggers, handling, and sanctions. (ISO 37301 §5–8)	Publish policy on intranet; include in induction; require annual declaration and ad-hoc updates before any decision-making.	Signed COI Policy; Annual COI Declaration s; COI Register; meeting minutes	ICO	Annual + event-driven	Draft/approve COI policy within 30 days; collect declarations from all managers/committee members within 14 days;

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Control Area	What “Good” Looks Like (ISO-Aligned Requirement)	Procedure (How APMT Does It)	Evidence to Keep	Owner	Frequency	If “No”, Required Corrective Action
			noting recusals.			implement a COI register.
5.2 COI in Procurement/Recruitment/Grants	Documented steps ensure decision-makers declare COI and recuse. (ISO 37001 §8.2)	Mandatory COI question on each evaluation form; chair confirms recusals before scoring; alternate panelist appointed if needed.	Tender/RFP Evaluation Forms; Recusal logs; Panel composition memos.	Procurement Lead / P&C	Every process	Add COI attestations to all templates; re-run evaluation if COI not disclosed.
5.3 Transparent Recruitment	Process criteria, scoring, approvals, and records are systematic and traceable. (ISO 9001 §8.5; ISO 21001 §8.5)	Job analysis → advert → shortlisting matrix → panel interview with model questions → reference/background checks → offer approval checklist.	Advert copies; Shortlisting matrix; Interview notes; Approval checklist.	P&C	Every hire	Introduce the shortlisting matrix and approval checklist within 10 days; train hiring managers.
5.4 Code of Conduct	Code sets behavioural expectations in and outside work, includes sanctions and reporting channels. (ISO 37301 §7.3)	Board approves Code; annual acknowledgement; embed in induction; link to disciplinary procedure.	Code (version-controlled); Acknowledgement forms; Disciplinary outcomes log.	ICO / P&C	Annual + new starter	Publish Code; require signed acknowledgements within 7 days of issue.
5.5 Whistleblower Policy	Protects whistleblowers from reprisals; allows confidential/anonymous reporting; prohibits retaliation. (ISO 37001 §8.9; 37301 §8.3)	Multi-channel intake (email, webform, hotline); non-retaliation clause; protected identity protocols.	Policy; Intake logs; Non-retaliation notices; Access-controlled case files.	ICO	Annual review; continuous use	Draft/approve policy; publish reporting channels on website/intranet; communicate protections company-wide.



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5.6 Whistleblower Process & Timelines	Clear triage, investigation standards, decision authority, and SLAs. (ISO 37301 §8.7)	Triage ≤5 business days; investigation plan ≤10; outcome letter and corrective actions; appeal route to Board/CEO.	Case register with dates; Investigation plans; Outcome letters; CAPA log.	ICO	Each case	Add SLA table to policy; implement case register template within 7 days.
5.7 Mandatory Training (Whistleblowing & Conduct)	New starters and periodic refreshers complete training; completion tracked. (ISO 9001 §7.2; 37301 §7.2)	Induction within 30 days of start; annual refresher e-module with quiz; escalations for overdue.	LMS/completion report; Quiz scores; Training calendar.	P&C	Monthly monitoring	Launch e-module; set automated reminders; report completion to ELT monthly.
5.8 Criminal Record Checks	Role-based screening aligned to law and client requirements; documented risk exceptions. (ISO 37301 §8.2)	Pre-employment police check for child-/vulnerable-related and finance roles; recheck every 3 years; exception memo approved by ICO if unavailable.	Police checks; Position risk matrix; Exception memos; Start-work conditional approvals.	P&C	Pre-hire; 3-year cycle	Implement role-risk matrix; partner with accredited check provider; add conditional start rules.
5.9 If No Criminal Checks	Alternative mitigations protect beneficiaries and assets.	Require statutory declarations; enhanced references; probation with closer supervision; task segregation.	Signed declarations; Supervision plan; Enhanced reference notes.	P&C / Line Manager	Pre-hire + first 3 months	Document mitigations; schedule 30/60/90-day reviews.
5.10 Reference Checks (Up to Two)	Minimum one, up to two, including a former employer where practicable; structured	Use standard template probing conduct, performance, integrity, rehire eligibility.	Reference check forms; Call notes; Identity	P&C	Pre-offer	Introduce template; return to candidate if referee not independent.



Control Area	What “Good” Looks Like (ISO-Aligned Requirement)	Procedure (How APMT Does It)	Evidence to Keep	Owner	Frequency	If “No”, Required Corrective Action
	questions. (ISO 9001 §8.4)		validation of referee.			
5.11 Background Checks (All Prospects)	Proportionate screening (ID, work rights, qualifications, gaps). (ISO 37301 §8.2)	Checklist tailored by role risk; verification via primary sources (universities, licensing bodies).	Background check checklist; Verification emails; Copies sighted.	P&C	Pre-offer	Activate vendor for checks; document unverifiable items and risk decision by ICO.

6. Standard Operating Procedures (SOP) — Summaries

1. SOP-COI-01: Conflict of Interest

- **Trigger:** On appointment, annually, and prior to any decision-making activity.
- **Key steps:** Disclose → record in COI Register → risk assess → mitigation (recusal, oversight) → communicate to chair.
- **Records:** COI form, Register entry, meeting minutes noting recusal.

2. SOP-REC-01: Transparent Recruitment

- **Artifacts:** Role profile, selection matrix, interview guide, approval checklist.
- **Decision rule:** No offer letter issued without completed reference and background checks (or approved exception).

3. SOP-COD-01: Code of Conduct

- **Onboarding:** Issue Code; collect signed acknowledgement within 7 days.
- **Breach handling:** Fact-finding → show-cause → outcome per Disciplinary Policy.

4. SOP-WB-01: Whistleblowing Intake & Investigation

- **Channels:** confidential email, webform, hotline, postal.
- **SLAs:** Triage ≤5 days; investigation plan ≤10; closure letter within 30 days (complex cases may extend with notice).
- **Protection:** Non-retaliation notice; remedies for reprisals.

5. SOP-SCR-01: Screening (Criminal/Background/References)

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- **Risk-based matrix:** High-risk roles (children/vulnerable/finance) = mandatory police check & two references; others = minimum one reference + ID/entitlement/qualification checks.
- **Re-checks:** Every 3 years for high-risk roles.

7. Forms & Registers (ready-to-use content outline)

- **FR-COI-01 Conflict of Interest Disclosure Form**
Fields: role, description of interest, relationship, decision/activity affected, proposed mitigation, sign/date.
- **RG-COI-01 COI Register**
Columns: person, interest summary, date disclosed, decision body, mitigation, review date.
- **FR-REC-02 Shortlisting Matrix**
Criteria with weights; panel scores; notes; cut-off rationale.
- **FR-REC-03 Interview Record**
Standard questions, behavioural probes, corroboration notes.
- **FR-BG-01 Background Check Checklist**
Identity, work rights, qualifications, gaps >3 months, police check status, references, exceptions.
- **FR-WB-01 Whistleblower Intake Form**
Date/time, channel, summary, risk rating, case handler, protection measures applied.
- **RG-WB-01 Whistleblower Case Register**
Case ID, triage date, plan date, outcome date, findings, CAPA.
- **TR-TNG-01 Training Completion Log**
Course, due date, completion date, score, non-compliance escalations.

8. Performance & Assurance

- **KPIs**
 - 100% of decision-makers with current COI declarations
 - 100% hires with documented reference check(s) and background check checklist
 - ≥95% induction completion within 30 days (Code + Whistleblowing)
 - 100% whistleblower cases meet triage SLA; ≥90% meet closure SLA
 - 0 substantiated retaliation incidents
- **Internal audit tests (quarterly)**
 - Sample 10% of hires: verify matrix, interview records, references, checks, approvals.
 - Sample all procurements >threshold: verify COI attestations and recusals.

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- Review whistleblower register for SLA adherence and CAPA closure.

- **Management Review (ISO 9001/21001)**

- Present KPI trends, audit findings, incidents, and improvement actions to ELT/Board semi-annually.

9. Document Control & Retention

- **Policies/SOPs:** controlled versions, review annually.
- **Recruitment & screening records:** 7 years from end of employment or per legal requirement.
- **Whistleblower case files:** minimum 7 years; restricted access (ICO/CEO).
- **COI Register:** permanent record of decisions affecting procurement/recruitment/grants.

10. Website & Public-Facing Statements (for www.apmt.com.fj)

Short statement for “Integrity & Compliance” page:

APMT maintains ISO-aligned integrity controls, including a Conflict-of-Interest framework, transparent recruitment, a published Code of Conduct, protected whistleblowing channels with clear timelines, and proportionate background, criminal-record, and reference checks. We prohibit retaliation, require annual COI declarations from leaders and panelists, and preserve verifiable records for audit. Our policies are reviewed annually and available on request to partners and regulators.

11. Quick Answers to the Regulator’s Questions (for submission forms)

- Conflict-of-Interest policy? Yes. Annual declarations and event-based disclosures are mandatory; recusals recorded in the COI Register.
- If ‘No’ (contingency text): Where a formal policy is not in place, APMT requires signed COI declarations on all procurement/recruitment/grant panels, records recusals in meeting minutes, and blocks conflicted staff from evaluation decisions.
- Transparent staff recruitment? Yes. Advertised criteria, shortlisting matrix, panel interviews, documented approvals.
- Code of Conduct with breach consequences? Yes. Code sets expected conduct in/out of the workplace and links to disciplinary procedure.
- Whistleblower policy protecting from reprisals? Yes. Non-retaliation provisions, confidential channels, anonymous reporting permitted.
- Clear process, handlers, timelines? Yes. Triage ≤5 business days; investigation plan ≤10; closure target 30 days; ICO leads; appeal to CEO/Board.
- Mandatory whistleblowing training for new staff/volunteers? Yes. Induction within 30 days; annual refresher tracked.
- Criminal Record Checks? Yes, risk-based by role; re-checks every 3 years for high-risk roles.

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- If 'No' (contingency text): Where a police check is not legally obtainable, APMT uses statutory declarations, enhanced references, supervision plans, and probationary reviews.
- Up to two references incl. previous employers? Yes. Minimum one, up to two; preference for a former employer; structured template.
- Policy/procedure requiring background checks for all prospective employees? Yes. Identity, work rights, qualifications, employment gaps; documented on a role-based checklist.

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