



Section	Human Resources
Procedure Title	Conflict of Interest (NDIS)

## 1 RELATED POLICIES/DOCUMENTS

Conflict of Interest NDIS Policy  
Code of Conduct Policy  
NDIS Business Process Policy & Procedure  
Feedback and Complaints Policy & Procedure  
Recruitment Policy

## 2 PURPOSE

ConnectGV will ensure that when providing supports to NDIS clients any conflict of interest will be declared.

## 3 RESPONSIBILITIES

All staff will act in the best interests of all ConnectGV clients, to ensure that clients are informed, empowered and able to exercise choice and control over their lives. Staff will not (by act or omission) constrain, influence, or force decision-making by a person with a disability and/or their family, so as to limit that individual's access to information opportunities, choice or control.

## 4 PROCEDURE

### Managing conflicts of interest generally

All clients accessing services from ConnectGV will be treated equally, and no client will be given preferential treatment above another in the provision of supports.

Staff will ensure that ConnectGV proactively manages actual and perceived conflicts of interest in services delivery by:

- Document and report on incidences of conflict, where they arise by notifying the Human Resources Manager of any conflict of interest. This will be entered into the HR system and noted in the Conflict of Interest register;
- Ensure that advice about support options (include supports not delivered by ConnectGV) is honest, impartial, and promotes choice and control; and
- Adhere to the ConnectGV Code of Conduct to avoid actual and perceived conflicts of interest.

Clients can make a complaint using the ConnectGV complaints procedure made available to all clients. Staff will proactively inform clients on how they can make a complaint.

### Managing conflict of interest in plan management and support coordination

Clients will be presented with a range of choices about providers of supports and staff will not seek to influence the client to select ConnectGV.

Case notes will be made in the COSMO database confirming the advice given to the client.

Members of the Support Coordination and Plan Management team will ensure that:

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- the organisation’s risk register and/or conflict of interest register includes the ongoing potential conflict of interest
- they declare to clients the potential conflict of interest of ConnectGV being both plan manager or support coordinator and a provider of other supports and affirm that the organisation will act as directed by the client and in the best interests of the client
- clients will be presented with a range of choices about providers of supports and not only ConnectGV and staff will not seek to influence the client to select ConnectGV.
- They emphasise feedback and complaint mechanisms and the right to support from an advocate should the client have any concerns about supports provided
- Where other providers do not currently have spare capacity clients will be presented with options regarding support delivery in the future, including whether they would like to be wait-listed with other providers

Case notes will be made in the COSMO confirming the advice given to the client.

### **Managing conflict of interest in Specialist Disability Accommodation (SDA) and Supported Independent Living (SIL)**

ConnectGV is committed to the active management of any conflicts of interest that may arise in the delivery of services. Clients’ rights are best upheld when their rights as a resident of an SDA dwelling are given effect separately from the support services they receive. To help ensure that the delivery of SDA and other NDIS supports are separable, ConnectGV has governance arrangements in place which separate the provision of each.

ConnectGV is committed to upholding the following processes and principles:

- Residents at ConnectGV SDA will be supported to understand the difference between the provision of specialist disability accommodation and other NDIS supports delivered in the dwelling;
- Where ConnectGV delivers both specialist disability accommodation and other NDIS supports to the same client, there will be separate service agreements for each service;
- In such cases, ConnectGV will actively manage any conflicts of interests in order to give clear effect to the client’s rights as a resident of the SDA dwelling, separately from the support services they receive; and
- The client’s housing rights, including security of tenure, will be upheld, irrespective of any choices the client makes about the provision of other NDIS supports in the SDA dwelling.

### **Managing conflicts of interest in the workforce**

It is the responsibility of both ConnectGV as an employer, and staff and volunteers themselves to identify, address and mitigate conflicts of interests (perceived or actual).

Staff and volunteers of ConnectGV should be attuned to any potential conflicts of interest and identify these to ConnectGV. All staff and volunteers are obliged to disclose any

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perceived or actual conflicts of interest that may affect their delivery of supports and services. This may include, but is not limited to:

Personal relationships with the client, their family, friends or carers;

Financial or commercial interest in an organisation or company providing products, services or supports to client or

Where the worker's beliefs and values may impact on their delivery of supports or services.

Whilst staff and volunteers have an obligation to identify and disclose conflicts of interest, ConnectGV also takes responsibility for ensuring our workforce is not affected by any personal conflicts of interest. ConnectGV will conduct the following measures:

- Screening potential employees and volunteers prior to hire, for any potential or real conflicts of interest. Screening practices may include probity checks and reference checks;
- Anticipating and raising any potential conflicts of interest with the staff member or volunteer;
- Continued supervision of staff and volunteers to identify any conflicts that may arise during the course of support provision;
- Ensuring workers are made aware of their obligation to declare a conflict of interest, and to inform clients when they have an interest that may impact supports and services provided;
- Ensuring that there is no remuneration or other financial incentive paid to support staff who refer clients to other services offered by the organisation; and

### Gifts, benefits and commissions

ConnectGV and its staff and volunteers will not accept any offer of money, gifts, services or benefits that would cause them to act in a manner contrary to the best interests of a client.

Additionally, staff and volunteers must not hold any financial or other personal interest that could influence or compromise the choice of provider or provision of supports to an NDIS client. This includes the offering of a commission by staff or ConnectGV.

## 5 DEFINITIONS

**Conflict of interest:** Conflict of interest can be potential or real, and occurs when a worker or an NDIS provider is in a position to exploit their own professional capacity for personal or corporate benefit. Conflicts of interest may include conflicts of a financial, business or personal nature, including any financial and/or corporate interest or relationship the NDIS provider may have with other entities, including businesses and organisations, or of a personal nature, including but not limited to cultural, religious or social relationships.

## 6 RELATED FORMS

Code of Conduct



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## How to Build Good Boundaries in Support Work

<b>Accountable</b>	Chief Operating Officer
<b>Responsible</b>	All staff
<b>Review Date</b>	26 Nov 2023

### Revision History

<b>Version</b>	<b>Approved/ Amended/ Rescinded</b>	<b>Approval Date</b>	<b>Management</b>	<b>Committee/ Board</b>	<b>Document Reference</b>
V1	Approved	26 Nov. 20	Senior Management	CPAR	Human Resources