

# SECTION 5 – Client Services

## Policy and Procedure

### NDIS and Conflict of Interests

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#### 1. POLICY

Inclusive Directions aims:

- To act in accordance with its values;
- To comply with its general and specific obligations as a registered provider of supports under the National Disability Insurance Scheme.

#### 2. PROCEDURES

##### 2.1 INTRODUCTION

As a registered provider of supports under the National Disability Insurance Scheme, Inclusive Directions has specific responsibilities in relation to:

- Managing conflicts of interest generally
- Managing conflicts of interest in plan management and support coordination, and
- Offering or receiving gifts, benefits and commissions.

##### 2.2 MANAGING CONFLICTS OF INTEREST GENERALLY

The NDIS Terms of Business for Registered Providers require providers to have policies about potential conflicts of interest in service delivery.

Inclusive Directions and its team members will ensure that when providing supports to customers under the NDIS, including when offering plan management or support coordination services, any conflict of interest is declared and any risks to customers are mitigated.

All employees will act in the best interests of NDIS participants and other customers, ensuring that participants are informed, empowered and able to maximise choice and control.

Staff members will not (by act or omission) constrain, influence or direct decision-making by a person with a disability and/or their family so as to limit that person's access to information, opportunities, and choice and control.

Employees will ensure that Inclusive Directions proactively manages perceived and actual conflicts of interest in service delivery. Employees will:

- Manage, document and report on individual conflicts as they arise, and
- Ensure that advice to a participant about support options (including those not delivered directly by Inclusive Directions is transparent and promotes choice and control.

As required by the NDIA Terms of Business, all participants will be "treated equally, and no participant shall be given preferential treatment above another in the receipt or provision of supports". (See note below.)

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**2.3 MANAGING CONFLICT OF INTEREST IN PLAN MANAGEMENT AND SUPPORT COORDINATION**

Members of Inclusive Directions performing plan management and support coordination functions will ensure that:

- The organisation’s risk register and/or conflict of interest register includes the ongoing potential conflict of interest
- Staff declare to customers the potential conflict of interest of Inclusive Directions being both plan manager or support coordinator and a provider of other supports and affirm that the organisation will act as directed by the customer and in the best interests of the customer
- Customers will be presented with a range of choices about providers of supports. Staff will not seek to influence the customer to select any particular service
- Customers will be presented with options regarding support delivery in the future, including whether they would like to be weight-listed with other providers
- Brief notes will be made in Supportability confirming the advice given to the customer.

**2.4 GIFTS, BENEFITS AND COMMISSIONS AND THE NDIS**

Inclusive Directions or its staff must not accept any offer of money, gifts, services or benefits that would cause them to act in a manner contrary to the interests of an NDIS participant. Further, employees must have no financial or other personal interest that could directly or indirectly influence or compromise the choice of provider or provision of supports to a participant. This includes the obtaining or offering of any form of commission by employees or Inclusive Directions

**3. REFERENCES**

- National Disability Insurance Scheme (Registered Providers of Supports) Rules 2013
- Terms of Business for Registered Providers (effective 1 July 2016)

**4. NOTES**

This does not prevent providers determining which people they will accept as customers on the basis of considerations such as: provider capability; the consequences of NDIS price caps; location; work health and safety; customer mix; and, risk appetite.

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