

## Policy – Conflict Of Interest Under The NDIS

Caringa Enterprises Ltd (Caringa) has been approved as both a registered Plan Management provider and as a registered provider of a wide range of other support services under the National Disability Insurance Scheme (NDIS). Caringa is aware of the potential for real or perceived conflict of interest in performing both these roles for an individual.

The NDIS requires that “If a registered plan management provider is also a provider of other supports received by the participant, then the registered plan management provider will need to have mechanisms in place for dealing with any conflicts of interest that might arise. These mechanisms would normally involve both policies and administrative procedures.”

This policy addresses these issues by using the following statements, actions and commitments:

1. Caringa plan management and support coordination activities and other support services have well defined and separate administrative policy, procedures and work instructions for Caringa staff to follow
2. Caringa staff will act in the best interests of participants to ensure they are informed, empowered and able to maximise choice and control
3. Caringa staff are instructed to always identify to NDIS participants that:
  - a. Caringa offers plan management, support coordination, as well as a wide range of other supports under the NDIS
  - b. the participant in the NDIS always has the choice to use either Caringa or other service providers in relation to plan management, support coordination and/or other supports
  - c. there are many other registered plan managers under the NDIS and they are listed on the NDIS website – Caringa staff are to purposely make NDIS participants aware of this
  - d. there may, and often will be, other service providers who offer identical or similar supports to Caringa and that it is always the choice of the NDIS participant which service provider they choose
  - e. even if a person chooses to use Caringa as their plan manager or supports coordinator they do not have to use any Caringa supports
  - f. Caringa will offer supports to NDIS participants regardless of whether they self-manage their plan, use the NDIA or any another registered plan manager
  - g. Caringa staff will obtain confirmation that the above information has been disclosed to participant in order to maximise choice and control

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4. Caringa staff will manage conflict of interests as they arise in line with NDIA Operational Guidelines or pricing arrangements and guidelines
5. Caringa staff will notify their manager of any conflicts as they arise as well as document it in the CEL Participant Conflict of Interest register
6. Participants are able to raise complaints using our grievance procedure or completing the feedback form available on the Caringa website
7. Caringa staff will under no circumstances accept any offer money, gifts, services, commissions or benefits that would cause them to act in a manner against the interests of the participant
8. Caringa staff are required to adhere to the Caringa Code of Conduct and Ethics, to avoid real or perceived conflicts of interest, and to record and report any which may be identified.

Based on its strong corporate governance structure and its mature Quality Management System, which includes a wide range of policies, procedures and work instructions, Caringa is currently registered by Commonwealth and NSW State Government departments as complying with:

- I. the National Standards for Disability Services for its Australian Disability Enterprises (DSS funded) services and operations
- II. the National Standards for Disability Services for its Ageing, Disability and Home Care (ADHC) funded residential and day program support services;
- III. the ISO 9001 Requirements for Quality Management Systems, and
- IV. the Office of the Children’s Guardian standards for Voluntary Out Of Home Care

This policy forms a part of Caringa’s Quality Management System and range of policies and procedures and is available on the Caringa website at [www.caringa.com.au](http://www.caringa.com.au) . This policy will be reviewed every two years, or earlier if need is identified.