

CAL POL-002	NDIS and Conflict of Interest in Service Delivery
--------------------	--

As a registered provider of supports under the National Disability Insurance Scheme, Caringa Australia Limited has 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.

Record of Policy Development

Version	Date Approved	Date for Review
1	27/11/2018	27/11/2019

Responsibilities and Delegations

This policy applies to	All Caringa Employees, Volunteers, Directors, & Executives
Specific Responsibilities	None
Policy Approval	Board of Directors

Policy Context- This policy relates to:

Standards	NDIS Practice Standards
Legislation	National Disability Insurance Scheme (NDIS Practice Standards) Rules 2018 National Disability Insurance Scheme (Code of Conduct) Rules 2018 National Disability Insurance Scheme (Provider Registration and Practice Standards) Rules 2018 National Disability Insurance Scheme (Quality and Safeguards Commission) Rules 2018 National Disability Insurance Scheme (Protection and Disclosure of Information—Commissioner) Rules 2018
Contractual Obligations	NDIS Quality and Safeguards Commission Registration
Organisation Policies	Code of Conduct Privacy Professional Ethics and Conduct
Forms, record keeping, other documents	Conflict of interest Declaration Support Coordination Note Client Contact Note Incident Report

Caringa Australia 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.

Procedures:

Caringa Australia Limited 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 Caringa Australia Limited 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 Caringa Australia Limited) 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".

Managing conflict of interest in Plan Management and Support Coordination

The role of Support Coordinator is responsible for Plan Management and Support Coordination only. Members of the Support Coordination and Plan Management Teams 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
- they declare to customers the potential conflict of interest of Caringa Australia Limited 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
- Where other providers are available, customers will be presented with a range of choices about providers of supports and not only Caringa Australia Limited and staff will not seek to influence the customer to select Caringa Australia Limited
- Where other providers are not available, such as some regional areas where only one provider exists, customers will:
 - be presented with options regarding self-employment, and/or
 - emphasise feedback and complaint mechanisms and the right to support from an advocate should the customer have any concerns about supports provided
- Where other providers do not currently have spare capacity: 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 Caringa's CRM Database (CTARS) confirming the advice given to the customer.

Gifts, benefits and commissions and the NDIS

Caringa Australia Limited 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 Caringa Australia Limited.

End of Document
