



Conflict of Interest Policy and Procedure



Purpose and Scope

Network Rehabilitation Group (NRG) are committed to proactively identifying, managing and, where possible, avoiding, real, perceived, or potential conflict of interest whilst operating Rehabilitation Support Services (RSS) and Network Case Management Services (NCMS). Actively managing conflict of interest is a key part of Network Rehabilitation Group's Risk Management Framework, a requirement of the NDIS (Code of Conduct) Rules 2018 and ensures we work with integrity, honesty, and transparency at all times.

This policy and procedure applies to all employees, contractors, reference group members, participants and family members who engage with Rehabilitation Support Services and Network Case Management Services.

2.0 Definitions

Conflict of Interest: When someone has real or perceived competing private and professional interests. These interests may make it difficult to fulfil their professional duties without bias or the perception of bias.

Real: where a direct conflict exists between current official duties and existing private interests.

Perceived: where it appears or could be perceived that private interests are improperly influencing the performance of official duties whether or not that is actually the case.

Potential: where private interests are not but could come into direct conflict with official duties.

Support Worker: A person employed to provide supports to our participants so they may achieve their goals

Participant: Refers to a person who accesses supports from either Network Case Management Services or Rehabilitation Support Services or both.

Family member: Refers to people who may or may not be directly related to the participant but who the participant identifies as having a significant familial affect in the participants life.

Key supporter: Refers to friends, partners or others who have experience in providing ongoing care and support to our participants.

Reference group member: A person that is a member of NRG's Reference Group

Employees: A person that has a employment contract with NRG whether it be casual, part-time, full-time or contract.

Omission: Withholding information

3.0 Policy

Conflicts of interest occur in all businesses, what is important is that we are aware of them, we declare them, and we find a way to mitigate any risk so we may provide our participants with the choice, control and high quality supports they deserve. All employees will act in the best interests of participants by ensuring compliance with NDIS standards, legislation and, ensuring that participants are informed, empowered and able to maximise choice and control. Employees 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. As required by the NDIS 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.

NRG employees will ensure they proactively manage, real, perceived or potential conflicts of interest in service delivery. As part of our commitment to ethical delivery of services all Network Rehabilitation Group employees, participants and contractors will:

- Act in accordance with our purpose and vision
- Avoid conflict of interest where possible
- Identify and disclose any conflicts of interest
- Comply with this policy and procedure
- Actively manage any conflicts of interest

Network Case Management Services: Support Coordinators and Specialist Support Coordinators need to be particularly aware of real, perceived, or potential conflicts of interest as their role is to support people to make choices about what is best for them to achieve their NDIS goals. As NRG offers both support coordination through NCMS and core supports through RSS we need to ensure we always remain transparent about this conflict.

Examples of conflict of interest include:

- A NCMS coordinator recommending RSS core supports without disclosing the business connection and without providing other core support providers.
- NCMS or RSS employees not disclosing that a potential employee is a friend or family member of theirs.
- An employee starts a part-time business offering support services to the same participant they deliver RSS supports to.
- An employee accepting gifts or treats from a participant or their family of more than a minor value.
- An employee accepting money from a participant as a 'thank you' for wonderful support
- If an employee is a friend or a family member of a participant, they might treat that person differently to the other people they support. For example, they might give the person extra support that they do not have to pay for because they are a friend.
- An employee is supporting a participant as both a NCMS and RSS employee.

- NRG not disclosing to participants that we provide coordination through NCMS and core supports through RSS.

4.0 Procedure

Conflict of interest is not the act of doing something wrong. It is just a state of being that arises when employees are not completely independent from NRG, our participants, or other organisations. However, with the right systems and processes in place, the risk that a conflict of interest will negatively impact on NRG or disadvantage a Participant can be mitigated.

Network Rehabilitation Group undertakes the following to mitigate the risks associated with conflict of interest:

- We have different websites for NCMS and RSS, creating service separation
- We declare our different service offerings in our Participant Welcome Pack
- We have a Conflict of Interest Declaration and Register
- We ensure all employees abide by the NDIS Code of Conduct, Guidance for Workers and NRG abides by NDIS Code of Conduct, Guidance for NDIS Providers
- We offer Professional Boundaries training through an online module, face to face at induction and within the Support Worker app (whenIwork)
- We include managing conflict of interest in our inductions and employee handbooks
- NCMS and RSS have separate service agreements to ensure participants and their families are aware that if they choose to use both services, they can cease either of them at any time and it won't affect their other support.
- We ensure our Coordinators are linking participants in with multiple providers that meet the NDIS requirements of choice and control and that we evidence this within our client files and Lumary.
- We provide our employees with supervision to ensure accountability

Registering a conflict of interest:

Potential employees: must declare any family connections to other NRG employees or participants as well as other employment they may have to their recruiting Manager, in writing via email.

The recruiting Manager will discuss the conflict with the General Manager and the GM will add it onto the Conflict of Interest Register if the candidate becomes an employee.

Current employees: All NRG employees must maintain integrity by declaring any real or perceived conflicts of interest to their line Manager, in writing via email. Their line Manager will discuss the conflict with the General Manager and the GM will add it onto the Conflict of Interest Register.

If an NRG employee is offered a gift, treat or money from a participant, their family, or another organisation this must be reported to their line manager, in writing via email. The manager will assess the situation and provide the employee with guidance on professional boundaries and conflict of interest if required.

If an NRG employee feels that their beliefs or values may impact on their ability to deliver high quality supports to the participant this must be reported to their line manager, in writing via email. The manager will discuss the situation with the employee and a mutually agreeable solution will be reached.

All new conflicts added onto the Conflict of Interest Register will be discussed monthly during NRG's Safety & Quality Committee meeting.

Failure to register a conflict of interest will result in disciplinary action and may result in dismissal.

5.0 Related internal documents

Risk Management Framework

Conflict of Interest Register

Code of Conduct

Participant Welcome Pack

Employee Handbooks

Employee Inductions

6.0 Supporting legislation and standards

NDIS Code of Conduct, Guidance for NDIS Providers

NDIS Code of Conduct, Guidance for Workers

NDIS Terms of Business March 2017

NDIS Code of Conduct Rules 2018

NDIS (Provider Registration and Practice Standards) Rules 2018

NDIS Act 2013

The Charter of Human Rights and Responsibilities Act 2006

Privacy Act 1988 (Commonwealth)

Australian Privacy Principles (APP)

Privacy and Personal Information Protection Act 1998

Disability Services Act (National Standards for Disability Services) Determination 2014

Corporations Act 2001

Authorised

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