

P81-v1-PS	Conflict Of Interest Policy & Procedure
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Version: 1	Applies to: Participants of the NDIS receiving Inclusion Melbourne supports.
Date approved: 23/09/2016	Specific responsibility: This policy and procedure is to be followed by Support Coordinators and the Manager, Personalised Supports.
Next review date: 23/09/2016	
Policy context:	
Standards or other external requirements	NDIS Service User Agreement
Legislation or other requirements	NDIS Act 2013
Contractual obligations	NDIS Terms of Business

POLICY STATEMENT

The purpose of this policy is to ensure Inclusion Melbourne effectively identifies, discloses and manages any actual, potential or perceived conflicts of interest in order to protect the integrity of Inclusion Melbourne, manage risk and act in the best interests of participants. Inclusion Melbourne 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.

Inclusion Melbourne maintains governance arrangements that ensure that there is equity of access and that no participant receives preferential treatment in the receipt or provision of supports.

Inclusion Melbourne will not enter into nor seek any financial commission or other personal arrangement that could directly or indirectly influence or compromise the choice of provider or provision of supports to a participant. Employees at Inclusion Melbourne will not accept any offer of money, gifts, services or benefits that may induce them to act in a manner contrary to the interests of the participant.

PROCEDURES:

1. Upon receipt of a referral for delivery of support coordination in the NDIS, Inclusion Melbourne will contact the individual and make a time to meet with them to discuss their NDIS plan and its implementation.
2. During the provision of Support Coordination, details relating to services requested by the participant will be discussed. In partnership, Inclusion Melbourne will identify relevant, appropriate and compatible service provider options.
3. A range of service providers who are capable of delivering those services will be discussed with the participant.
4. Where Inclusion Melbourne is a registered NDIS provider of services that are sought by the participant, the Support Coordinator may also identify Inclusion Melbourne as a potential service provider.

5. If the participant wishes to further explore additional service options beyond Support Coordination with Inclusion Melbourne, the support coordinator will not provide any recommendation nor contact with referees in relation to the provision of these services.
6. Where a participant seeks to learn more about any service, including those provided by Inclusion Melbourne, the support coordinator will provide the relevant contact details to the participant and or his/her nominee.
7. Where a participant utilising Inclusion Melbourne to provide Support Coordination elects to meet with Inclusion Melbourne to learn about another service provided by Inclusion Melbourne, the support coordinator will not be party to the conversation nor be present during the conversation.
8. If a participant seeks to use Inclusion Melbourne to provide services other than Support Coordination, the **Support Coordinator will:**
 - i. Detail these services in the relevant schedule of the participant agreement;
 - ii. Document that the potential for a conflict of interest exists for any such services;
 - iii. Document that the potential for a conflict has been discussed with the participant; and
 - iv. Maintain evidence of the details of the range of options discussed and offered to the participant
9. If a participant seeks to use Inclusion Melbourne to provide services other than Support Coordination, **the participant will acknowledge (via initials / signature) that he/she has:**
 - i. been informed of, discussed and offered alternative service provider options;
 - ii. selected Inclusion Melbourne to deliver the service as detailed in the schedule; and
 - iii. been informed of the potential for a conflict of interest to exist;
10. Where it is the participant's preference, and in situations where there is uncertainty about the participant's ability to exercise informed and empowered choice and control, a trusted third party that is independent of Inclusion Melbourne will be included in the decision making process.
11. This policy and associated process will be applied in every instance of a potential for conflict of interest.

DOCUMENTATION

Documents related to this policy	
Related policies	Access & Equity Satisfaction, Feedback & Complaints
Forms, record keeping or other organisational documents	Staff Code of Conduct

Reviewing and approving this policy		
Frequency	Person responsible	Approval
2 years	Manager, Personalised Supports	Manager, Personalised Supports

Policy review and version tracking

Review	Date Approved	Approved by	Next Review Due
1	23/09/2016	Manager, Personalised Supports	23/09/2018
2			
3			

Last updated:23/09/2016