

DOCUMENT HRP011 Conflict of Interest Policy

Document Information and Revision History			
Document Owner		Community Connection Incorporated	
Approved By		Manager and Management Board	
Distribution List		Community Connection Staff, Board Members, Individuals and their Families by email and/or mail	
Review Frequency		Every 3 years; or when triggered by an event or finding(s) that identify improvement and/or changes of legislation necessitate an amendment	
Document location		Governance	
Last Reviewed	Date to be Reviewed	Review Team	Nature of amendment
January 2016	January 2019	Management Team	
May 2016	January 2019	Marie	Format Change
June 2017	June 2020	Management and Board	Complete change to document to incorporate NDIS

1. REFERENCES

National Standards for Disability Services (also compliant with HSQF)

6. Service Management: The service has effective and accountable service management and leadership to maximise outcomes for individuals.

2. COMMUNITY CONNECTION INCORPORATED'S POSITION

Community Connection Incorporated has been approved as a registered provider for Support Coordination, Plan Management and Other Support services under the National Disability Insurance Scheme (NDIS.) Community Connection Incorporated is aware of the potential for real or perceived conflict of interest in performing two or more of these roles for the individual, we will ensure that there are mechanisms in place for dealing with any conflicts of interest that might arise. These mechanisms will comprise of policies and administrative procedures and will ensure that the governance, management and operations of the Organisation are transparent and comply with all regulations and legislation.

3. POLICY STATEMENTS

- 3.1 Community Connection Incorporated's support coordination and plan management activities and other support services have well defined and separate procedures for employees to follow
- 3.2 Community Connection Incorporated's employees will act in the best interests of the participant to ensure they are informed, empowered and able to maximize choice and control

- 3.3 Community Connection Incorporated's employees are instructed to always identify to the NDIS participant that:
- Community Connection Incorporated offers support coordination, plan management, as well as other supports under the NDIS
 - The participant always has the choice to use either Community Connection Incorporated or other service providers in relation to support coordination, plan management and/or other support
 - There are many other registered support coordinators, plan managers etc. under the NDIS and they are listed on the NDIS website. Employees are to purposely make NDIS participants aware of this.
 - There are other service providers who offer identical or similar supports to Community Connection Incorporated and that it is always the choice of the NDIS participant as to which service provider they choose
 - If a participant chooses to use Community Connection Incorporated as their supports coordinator or plan manager they do not have to use any other support from Community Connection Incorporated.
 - Community Connection Incorporated will offer supports to NDIS participants regardless of whether they self-manage their plan, use the NDIA or any another registered plan manager.
 - Community Connection Incorporated employees will obtain confirmation that the above information has been disclosed to the participant in order to maximise choice and control
- 3.4 Community Connection Incorporated employees will manage conflict of interests as they arise in line with NDIA Operational Guidelines or pricing arrangements and guidelines.
- 3.5 Community Connection Incorporated employees will notify the manager of any conflicts as they arise which will be documented for discussion in the monthly business meeting.
- 3.6 An employee who believes that another person has an undeclared conflict of interest should raise their concern, as appropriate, with the Manager.
- 3.6 Participants are able to raise complaints using our complaints procedure or completing the enquiry form available on the Community Connection Incorporated website.
- 3.7 Community Connection Incorporated employees 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
- 3.8 Community Connection Incorporated staff are required to adhere to the Community Connection Incorporated Code of Conduct, to avoid real or perceived conflicts of interest, and to record and report any which may be identified.

4. CONFLICT OF INTEREST WITH THE BOARD OF COMMUNITY CONNECTION INCORPORATED

- 4.1 The Board places great importance on making clear any existing or potential conflicts of interest. All such conflicts of interest shall be declared by the Board Member concerned as soon as they become aware of it.
- 4.2 Board Members will inform the Chairperson or the Board as a whole of any conflict of interest.
- 4.3 A Board Member who believes that another person has an undeclared conflict of interest should raise their concern with the Chairperson or with the Board as a whole.

5. ACTING ON A CONFLICT

- 5.1 When a Board Member declares a conflict of interest the rest of the Board will discuss the conflict and come to a decision as to whether the conflict is significant enough to exclude the member from voting. Any situation which involves financial gain for a member or their family shall always result in exclusion from voting.
- 5.2 When the Manager declares a conflict of interest, the Chairperson and/or the Board will make a determination as to what action the conflict requires.
- 5.3 When any other employee declares a conflict of interest, the Manager will make a determination as to what action the conflict requires.

6. DOCUMENTING A CONFLICT

The Board shall maintain a Conflicts of Interest Register and record all reported conflicts within the Minutes of the Meeting. In addition, the nature of the conflict and the outcome of the discussion regarding it shall be recorded in the minutes of the meeting at which the conflict is declared.

A similar Register shall be maintained in the monthly business meeting minutes to record conflicts of interest that may pertain to the Manager and other employees.