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Responsible person:	EO	Scheduled review date:	December 2022
Associated documentation:	Conflict of Interest Register, Conflict of Interest Declaration		

PURPOSE

Interchange IE is committed to ensuring that actions and decisions taken at all levels in the organisation are informed, objective and fair, free from the influence of conflicts of interest.

Interchange IE will proactively manage any perceived and actual conflicts of interest through the development and maintenance of organisational policies.

Identified conflicts of interest require action to be undertaken to ensure that personal or individual interests do not impact on the organisation's services, activities or decisions.

SCOPE

All management, staff, volunteers including the Board and contractors must act in the interests of the organisation and notify the organisation when any conflicts occur with other interests or commitments.

POLICY

Declaration and management of conflicts of interest are required explicitly by the Executive Officer and/or the Board, as part of their legal responsibilities as the controlling member of the organisation.

This policy requires management, staff and volunteers (including the Board) to disclose any outside interests that conflict with the interests of the organisation. The Executive Officer and Senior Management must act impartially, and without prejudice, and not accept gifts or benefits that would influence any decision relating to Interchange IE.

Examples may include:

- Close personal friends or family members involved in decisions about employment, discipline or dismissal, service allocation, or awarding of contracts
- Individuals, or their close friends or family members, who are gaining financially or gaining some other form of advantage
- An individual engaged by another organisation offering services that are in a competitive relationship with Interchange IE. The individual may have access to commercially sensitive information, plans or financial information which conflict with Interchange IE interests
- Prior agreements or allegiances that are binding an individual to other individuals or agencies, requiring them to act in the interests of another party or to take a position on an issue that will conflict with Interchange IE.

MANAGING BUSINESS CONFLICT OF INTEREST

Managing Conflict of Interest in Support Coordination Services -

The Support Coordinator must act with integrity, honesty and transparency

When delivering Support Coordination, staff must only recommend and provide supports that are appropriate to participants 'needs providing accurate information on:

- Supports, services or products delivered by providers, including IIE.
- Capacity, qualifications, training and professional affiliations of providers and their staff, including IIE and its staff; and
- full costs of support and what these include.

Any conflict of interest related to delivering Support Coordination must be declared to all participants as part of their intake and assessment. Strategies to address the conflict must also be explained. Should a client choose to use another provider because of this conflict, staff must respect their decision.

Participants and their families must also be informed about their right to change to an alternative Support Coordination provider

and how they can go about doing so, as well as IIE Care's feedback and complaints processes.

The following strategies are in place at IIE to manage the conflict of interest involved in delivering Support Coordination along with other NDIS supports:

- Maintaining a clear separation of responsibilities between Support Coordination staff and other staff;
- Clear separation of service areas in the client management software with separate administrator and user access;
- Control preventing Support coordinators from accessing general NDIS information of participants;
- Providing participants with the option of several providers for each type of support they are seeking;
 - where only one option of provider can be suggested for a particular support, making detailed case notes documenting the rationale for this, and reviewing it regularly.
- Keeping detailed records of any issues that may arise or incident reports if required, regarding supports provided to a participant by IIE Care, including actions taken and resolutions;
- Continually working with participants and other areas of IIE to understand how well their supports are meeting their needs and adjusting support delivery before issues emerge;
- Explaining the difference between Support Coordination and other supports funded in participants' NDIS plans, including the requirement that supports provided be reasonable and necessary; and
- Explaining that any choice participants make about providers of other supports will not impact the provision of their Support Coordination.

PROCEDURES

A Conflict of Interest Register will be maintained, and management, staff and volunteers (including the Board) will be asked to declare:

- potential or actual conflicts of interest that exist when a person joins the organisation

- conflicts of interest that arise during their involvement with the organisation, which will be recorded in the register maintained by the Executive Officer or their delegate.

All potential and actual conflicts will be recorded in the register and reported regularly to the Board.

All management, staff and volunteers (including the Board) are required to declare any potential or actual conflicts of interest that become evident during their involvement with the organisation.

All management, staff and volunteers (including the Board) must speak with the Executive Officer when a conflict becomes apparent and provide formal notification in writing to the Executive Officer of the conflict.

MANAGEMENT OF CONFLICTS OF INTEREST

Where a conflict of interest is declared or identified by any member of our organization:

- The Executive Officer and/or Board will assess the conflict
- If a conflict of interest exists, or there is a perception that a conflict exists, the person may be asked to:
 - Contribute to discussions but abstain from voting or taking part in a decision on matters relating to the conflict
 - Observe but not take part in discussion or decision-making related to the conflict
 - Leave a meeting during discussion and before a decision has been made relating to the conflict
 - formally withdraw from formal governance role as per Interchange Board or sub-committee membership

STAFF INVOLVEMENT IN EXTERNAL ACTIVITIES

Interchange IE encourages and supports staff to become involved in community activities and volunteer work in their personal lives.

However, it is possible that staff may undertake volunteer or professional roles outside the organisation that may give rise to a conflict of interest, or a perception of conflict, e.g. staff undertaking consultancy work for member organisations or government agencies.

As a result, Interchange IE expects that all staff declare their involvement in external work-related activities to allow for discussion and management of the potential conflicts of interest with the Executive Officer. Staff members who undertake other (new) work outside of the organisation need to inform Interchange IE.

CONTRACTORS

All contracts with external consultants engaged by the organisation will include a Conflict of Interest Declaration confirming that no conflict of interest exists.

RELATED DOCUMENTS

- Code of Conduct – NDIS and Interchange IE
- Conflict of Interest Declaration
- Conflict of Interest Register
- Privacy Policy

RELATED REFERENCES

- Australian Privacy Principles (APP) 2014
- NDIS Act 2013
- NDIS Practice Standards and Quality Indicators 2018
- Privacy Act 1988 (Commonwealth)
- Privacy and Personal Information Protection Act 1998