



P026 – CONFLICT OF INTEREST SERVICE DELIVERY POLICY

1. Scope

This policy applies to:

- Participants engaged with services
- board members
- all staff, including managers and supervisors; full-time, part-time or casual, temporary or permanent staff; job candidates; student placements, apprentices, contractors, sub-contractors and volunteers.

2. 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.

3. Procedures

District 360 and its team members will ensure that when providing supports to participants under NDIS, including when offering support coordination services, any conflict of interest is declared and any risks to participants are mitigated.

All employees will act in the best interests of NDIS participants and other participants, 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 District 360 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 District 360) 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”.

4. Managing conflict of interest in Service provisions and Support Coordination

The role of Support Coordinator is responsible for Support Coordination only. Members of the Support Coordination Teams performing 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 participants the potential conflict of interest of District 360 being both Service provider 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, participants will be presented with a range of choices about providers of supports and not only District 360 and staff will not seek to influence the customer to select District 360.
- Where other providers are not available, such as some regional areas where only one provider exists, participants 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: participants will be presented with options regarding support delivery in the future, including whether they would like to be wait listed with other providers
- Support coordinators will capture in their notes in District 360 CMS confirming the advice given to the customer.
- Support coordinators are required to complete and obtain the participant's signature F030 Service Recommendation Form and then submit to the bookings team F018 Service Request Form

5. Gifts, benefits and commissions and the NDIS

District 360 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 District 360.

6. Other relevant District 360 policies

Staff, especially managers and supervisors, are encouraged to read this policy in conjunction with other relevant District 360 policies, including:

- Participant Decision Making and Choice Policy
- The National Disability Insurance Scheme Act 2013 (NDIS Act)
- NDIS Practice Standards
- WA Disability Services Act 1993
- VIC Disability Amendment Act 2017

7. More information

If you have a query about this policy or need more information, please contact the management team at info@district360.com.au

8. Review details

Approval Authority	Tanya Johnston
Responsible Officer	Coco Johnston
Approval Date	14 April 2021
Last updated Date	21 April 2023
Next Review Date*	21 April 2024
Last amended	Changed company logo.

** Unless otherwise indicated, this procedure will still apply beyond the review date.*

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