

POLICY – YLYC MANAGING POTENTIAL CONFLICTS OF INTEREST

1.0 Background:

ALARA QLD Limited is a registered host provider for the Your Life Your Choice (YLYC) programme which is funded through the Department of Communities, Disability Services and Seniors (State). ALARA is also a provider of a range of direct support services funded through the Department. The organisation is aware of a potential conflict of interest in performing these roles for participants.

This policy outlines the approach to dealing with any conflicts or potential conflicts of interest that may arise.

ALARA is committed to ensuring that any potential conflicts of interest are identified and managed in a manner that ensures that clients and families retain choice and self-determination in relation to the use of their funding and the integrity of the organisation is protected.

2.0 Purpose:

This policy outlines the key statements and commitments to be adopted by ALARA staff and management in relation to potential conflict of interest in the course of planning or provision of host provider services and supports under the YLYC programme.

3.0 Scope:

This policy applies to all Management, Staff and Volunteers of ALARA QLD Limited.

4.0 Definitions:

Conflict of Interest for the purposes of this policy refers to a situation where a conflict arises between two competing interests. Most frequently, but not exclusively, this would relate to the interests of the organisation versus participant interests. This refers to a reasonably perceived, potential or actual conflict of interest

A *Client* for the purpose of this policy is an individual who is funded through the YLYC programme.

5.0 Responsibilities:

The **Executive Manager (EM)** is responsible for ensuring that systems are in place that define and control and eliminate potential conflict of interest in the provision of YLYC host provider services and service. The EM is also responsible to ensure that participants have access to transparent and accessible complaints processes at any point.

All **staff and volunteers of ALARA** are responsible to adhere to the statements and commitments included in this policy.

6.0 Date Effective:

First Issue: September 2016

Revised: January 2018

7.0 Content:

As a Host Provider ALARA will act in the best interests of participants to ensure they are informed, empowered and able to exercise maximise choice and control along the continuum of self-direction and self-management.

The organisation will have systems and processes in place to ensure that its organisational or ethical values do not impede a client's right to choice or control and does not direct or influence a participants choices.

The following processes and commitments will be adhered to:

Management of potential conflict of interest in the provision of YLYC Host Provider Services

- ALARA's Host Provider services and direct services will have well defined and separate reporting and administrative procedures to follow
- Host Provider services will be part of the Plan Management arm of the organisation which is a separate arm of ALARA.
- Staff engaged as officers in the YLYC programme will not play any role in the coordination of delivery of direct services for the participants they are supporting.

- An NDIS participant always has the choice to use either ALARA or other service providers in relation to YLYC host provider services.
- There are many host providers listed on the Department's website – ALARA staff are required to make NDIS participants or potential participants aware of this
- There are other service providers who offer identical or similar supports to ALARA and that it is always the choice of the NDIS participant which service provider they choose
- All advice offered to a participant about the range of possible support options and providers will be transparent and promote choice and control.
- If a person chooses to use ALARA's YLYC Host provider services they do not have to use any ALARA supports or services
- Where ALARA provides cash advances or reimbursements under the YLYC programme, systems will be in place to ensure funds that are allocated to participants remain independent of funds used for other organisational purposes and are only used for the purposes intended. Clear guidelines will be in place regarding the allocation of funds, the independence of these funds and the process of managing a participant's funds as stipulated in the participant's plan.
- ALARA staff and volunteers are required to comply with the ALARA Code of Conduct and code of Conduct for Working with Children and Young People

Gifts, Benefits or Commissions

- ALARA staff or volunteers will not accept any offer of money, gifts, services or benefits that would cause them to act in a manner contrary to the interests of the client.
- ALARA or its staff or volunteers will 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 client. This includes the obtaining or offering of any form of commission.
- No ALARA staff member or volunteer is to incentivise participants to utilise services provided by the service arm of the organisation

Management of Conflicts of Interest

- ALARA will manage potential conflict of interests as they arise in line with the Department's guidelines for the YLYC programme.
- ALARA staff and volunteers will notify their manager of any conflicts as they arise as well as document it in the *ALARA Conflict of Interest Register*
- Clients are able to raise complaints using the ALARA Complaint's Procedure which will be provided to them in writing and is available on the ALARA website

8.0 Quality Standards:

Human Services Quality Standards:

- Standard 1 – Governance and Management
- Standard 2 – Service Access
- Standard 3 – Responding to Individual Need
- Standard 4 – Safety, Well Being and Rights
- Standard 5 – Feedback, Complaints and Appeals
- Standard 6 – Human Resources

9.0 Related Documents:

- Policy – Brokerage/Subcontracting
- Policy – Complaints Management and Resolution
- Policy – Donations and Gifts
- Policy - Purchasing
- Policy – Service Provision

- Statement – Code of Conduct
- Statement – Code of Conduct for Working with Children and Young People

- Conflict of Interest Register.

10.0 References:

- Your Life Your Choice – Host Provider Handbook June 2015



Executive Manager
ALARA QLD Limited

30/1/18
Date: