

POLICY – MANAGING POTENTIAL CONFLICTS OF INTEREST – PLAN MANAGEMENT AND SUPPORTS COORDINATION SERVICES

1.0 Background:

ALARA QLD Limited has been approved as a registered Plan Management provider, a provider of Support Coordination and is also a registered provider of a wide range of other support services under the National Disability Insurance Scheme (NDIS). The organisation is aware of a potential conflict of interest in performing these roles for participants.

It is a requirement of the NDIS that a provider of Plan Management and Support Coordinator is also a provider of direct supports, then the registered Plan Management/Support Coordination provider will need to have mechanisms in place for dealing with any conflicts of interest that might arise. These mechanisms would normally involve both policies and administrative procedures.

ALARA is committed to ensuring that any potential conflicts of interest are identified and managed in a manner that ensures that participants 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 NDIS funded plan management and support coordination services.

3.0 Scope:

This policy applies to the Board of Directors, Management and staff engaged directly or in support to ALARA's Plan Management and Support Coordination Services.

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 *Participant* for the purpose of this policy is an individual whose access request to the NDIS has been determined 'eligible'.

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 NDIS funded plan management, support coordination and service delivery. 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

Reviewed: September 2018

Reviewed: November 2019

7.0 Content:

As an NDIS Registered Provider of Supports Coordination and Plan Management, ALARA will act in the best interests of participants to ensure they are informed, empowered and able to exercise maximise choice and control.

The organisation will have systems and processes in place to ensure that its organisation or ethical values do not impede a participant'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 Plan Management and Supports Coordination Services

- ALARA's Plan Management and Support Coordination Services and direct services will have well defined and separate administrative procedures to follow

ALARA QLD Limited. Managing Potential Conflicts of Interest – NDIS Plan Management/Support Coordination

- Staff engaged as Plan Managers and Support Coordinators 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 plan management, support coordination and/or other supports
- There are many other registered plan managers and organisations providing support coordination under the NDIS and they are listed in the NDIS portal– 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 support options will be transparent and promote choice and control.
- If a person chooses to use ALARA's Plan Management or Support Coordination Services they do not have to use any ALARA supports or services
- ALARA will offer supports to NDIS participants regardless of whether they self-manage their plan, use the NDIA or another registered Plan Manager
- Where ALARA operates as a financial intermediary, systems will be in place to ensure funds that are allocated to participants remain administratively independent of funds used for other organisational purposes and are only used for the purposes intended.
- 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 and NDIS Code of Conduct

Gifts, Benefits or Commissions

- ALARA staff or volunteers will not accept any offer of money, commission, discounts, gifts, services or benefits that would cause them to act in a manner contrary to the interests of the participant.

- 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 participant.
- No ALARA staff member or volunteer is to incentivise participants to utilise services provided by another service arm of the organisation

Management of Conflicts of Interest

- ALARA will manage conflict of interests as they arise in line with NDIA Operational Guidelines or pricing arrangements and guidelines
- The ALARA Board of Directors, Leadership Team and ALARA Plan Management and Support Coordination staff will notify their manager of any conflicts as they arise as well as document it in the *ALARA Conflict of Interest Register*
- Participants are able to raise complaints using the ALARA Complaint's Procedure which will be provided to them in writing. A Fact Sheet is available on the ALARA website.

8.0 Quality Standards:

NDIS Practice Standards

Core:

1. Rights and Responsibilities

- Person Centred Supports
- Independence and informed Choice

Specialist Supports Coordination Module:

- Specialised Supports Coordination
- Management of the Participants NDIS Supports
- Conflict of Interest

9.0 Related Documents:

- Policy – Brokerage/Subcontracting
- Policy – Conflict of Interest - General
- Policy – Complaints Management and Resolution
- Policy – Donations and Gifts
- Policy - Purchasing

ALARA QLD Limited. Managing Potential Conflicts of Interest – NDIS Plan Management/Support Coordination

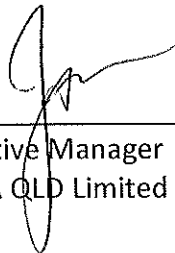
- Policy – Service Provision
- Procedure – Service Provision - Plan Management
- Procedure – Service Provision – Support Coordination
- Procedure – Concerns (Stage 1 Complaints)
- Procedure – Complaints Management Resolution (Stages 2-4)

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

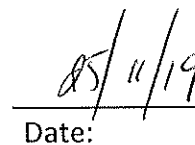
- Conflict of Interest Register.

10.0 References:

- NDIS Terms of Business for Registered Providers



Executive Manager
ALARA QLD Limited



Date: