
SD – Conflict of Interest

POLICY

The purpose of this policy and procedure is to set out how Headway Gippsland manages conflicts of interest in an open and transparent manner. It applies to all staff and includes potential conflict of interests where services include Support Coordination and Plan Management.

When providing supports to participants, staff must not influence or direct participants' or their supporters' decision-making, or limit their access to information, choice and control. Advice and information provided about support options (in and outside Headway Gippsland) must be accurate, transparent and objective. All participants must be treated equally and not given preferential treatment above others.

Headway Gippsland provides information about conflicts of interest to participants, their families and carers in a variety of ways. This includes through handbooks and brochures. Written information can be provided in Easy English or explained verbally by staff. Headway Gippsland staff can also help participants access interpreters or advocates where required.

Plan Management and Support Coordination

When delivering Plan Management and/or Support Coordination, staff must only recommend and provide supports that are appropriate to the needs of participants. This means providing truthful information about the:

- capacity, qualifications, training and professional affiliations of providers and their staff, including Headway Gippsland and its staff;
- supports, services or products delivered by providers, including Headway Gippsland; and
- full costs of supports and what these include.

Information provided to support participants' decision making may include quotes, cost breakdowns for different support options; other people's feedback about supports they've received and the risks and benefits of different supports.

Headway Gippsland will include and monitor the conflict of interest related to delivering Plan Management and/or Support Coordination along with other NDIS supports in its Risk Register.

This conflict of interest must be declared to all participants using Headway Gippsland's Plan Management and/or Support Coordination services, as part of their intake and assessment. Strategies to address the conflict must also be explained. Should a participant choose to use another provider because of this conflict, staff must respect their decision.

Strategies Headway Gippsland has in place to manage the conflict of interest involved in delivering Support Coordination along with other NDIS supports include:

- maintaining a clear separation of responsibilities between Support Coordination staff and other staff
- 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, thoroughly documenting the rationale for this, and reviewing it regularly
- keeping detailed records of any issues that arise with supports provided to a participant by Headway Gippsland, including the actions taken and how the issue was resolved

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- continually working with participants and other areas of Headway Gippsland 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.

Strategies Headway Gippsland has in place to manage the conflict of interest involved in delivering Plan Management along with other NDIS supports include:

- maintaining a clear separation of responsibilities between Plan Management staff and other staff and
- continually monitoring its financial practices to ensure participants' NDIS funds are:
 - accounted for separately to Headway Gippsland's funds; and
 - used for the purpose they were provided and in participants' best interests.

People must also be informed about their right to change Support Coordinators and/or Plan Managers and how they can go about doing so, as well as Headway Gippsland's feedback and complaints processes