

## NDIS & Conflict of Interest

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### Purpose

Headway has been approved as a registered provider for a suite of support services under the National Disability Insurance Agency (NDIS). Headway is aware of the potential or real or perceived conflict of interest in performing both these roles for an individual. The NDIS requires that “if a registered plan management provider is also a provider of other supports received by the participant, then the registered plan management 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 administration procedures.”

Headway 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.
- Headway staff will act in the best interest of participants to ensure they are well informed, empowered and able to maximize choice and control

### Procedure

#### Introduction

As a registered provider of supports under the National Disability Insurance Scheme, Headway has responsibilities in relation to:

- managing conflicts of interest generally
- managing conflicts of interest in plan management and support coordination, and
- offering or receiving gifts, benefits and commissions.

## NDIS & Conflict of Interest

### Managing Conflicts of Interest Generally

The NDIS Terms of Business for Registered Providers require providers to have policies about potential conflicts of interest in service delivery.

Headway and its team members will ensure that when providing supports to customers under the NDIS, including when offering plan management or support coordination services, any conflict of interest is declared and any risks to customers are mitigated.

All employees will act in the best interests of NDIS participants and other customers, 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 Headway 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 Headway) is transparent and promotes choice and control.
- The participants in the NDIS always have the choice to use whether Headway or other service providers in relation to plan management, support coordination and/or other supports.
- There are many other registered plan managers under the NDIS that are listed on the NDIS website. Headway staff purposely inform NDIS participants of this website.
- There are and often will be, other service providers who offer identical or similar supports to Headway and it is always the choice of the NDIS participant which service provider they choose.
- Should a participant choose to use Headway as their plan manager or support coordinator, they are not obliged in any way to use any Headway supports.
- Headway will offer supports to NDIS participants irrespective of whether they are self-managed, use the NDIA or any other registered plan manager.
- Headway staff will obtain documented confirmation that the above info has been disclosed to the participant in order to maximise their choice and control.
- engagement of family, friends and networks in a manner that would constitute a conflict of interest

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”.

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### Managing Conflict of Interest in Plan Management & Support Coordination

Members of the Headway Teams performing plan management and 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 customers the potential conflict of interest of Headway being both plan manager 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
- customers will be presented with a range of choices about providers of supports and not only Headway and staff will not seek to influence the customer to select Headway
- Brief notes will be made in the CRM confirming the advice given to the customer.
- Headway staff will manage conflict of interest as they arise in accordance with NDIA Operational Guidelines or pricing arrangements and guidelines.
- Participants may lodge complaints using Headway's Feedback Policy
- Headway staff are required to adhere to the Headway code of conduct to avoid real or perceived conflicts of interests, and to record and report any which may be identified.

### Gifts, Benefits, Commissions & The NDIS

Headway 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 a 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 Headway.

### **Related Documents**

#### Policy/Manual

Conflict of Interest Policy

#### Other

National Disability Insurance Scheme (Registered Providers of Supports) Rules 2013

Terms of Business for Registered Providers (effective 1 July 2016)

NDIS Provider Register - <https://www.ndiscommission.gov.au/resources/ndis-provider-register>

## NDIS & Conflict of Interest

### Document Control

Document Name	NDIS & Conflict of Interest Policy	Document ID	
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