

Conflict of Interest (NDIS)



<i>Policy No.</i>	3.6	<i>Created by</i>	Morag Roseby
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<i>Supporting Documents</i>			
<i>Associated Legislation</i>			

Policy Statement

Stepping Stone aims:

- To act in accordance with the Clubhouse model and values;
- To comply with its general and specific obligations as a registered provider of supports under the National Disability Insurance Scheme.

Procedures

Introduction

As a registered provider of supports under the National Disability Insurance Scheme, Stepping Stone 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.

Managing conflicts of interest generally

Stepping Stone will ensure that when providing supports to members and NDIS participants under the NDIS, including when offering Support Coordination services, any conflict of interest is declared and any risks to customers are mitigated.

All staff will act in the best interests of members and NDIS participants, ensuring that members and NDIS participants are informed, empowered and able to maximise choice and control. Staff will not (by act or omission) constrain, influence or direct decision-making for a member or NDIS participant and/or their family so as to limit that person's access to information, opportunities, and choice and control.

Staff will ensure that Stepping Stone proactively manages perceived and actual conflicts of interest in service delivery. Staff will:

- Manage, document and report on individual conflicts as they arise, and
- Ensure that advice to a member/NDIS participant about support options (including those not delivered directly by Stepping Stone) is transparent and promotes choice and control.

As required by the NDIA Terms of Business, all members/NDIS participants will be "treated equally, and no member/NDIS participant given preferential treatment above another in the receipt or provision of supports". (See note below.)

Managing Conflict of Interest in Support Coordination for Stepping Stone members.

Stepping Stone is committed to providing support to members under NDIS as determined by the member. Stepping Stone provides both coordination of supports and general service provision under NDIS. We are committed to supporting our members to make fully informed decisions, and understand that members may elect to receive support from organisations other than Stepping Stone.

- Where a staff is providing coordination of support under NDIS, they will not provide any additional NDIS services to that member.
- Communication from Support Coordinators regarding Stepping Stone members including service agreement requests will be directed through the NDIS email address, not discussed within the clubhouse space.
- Separate service agreements will be created for support co-ordination, and all other direct supports.
- Support coordination documentation will be kept separate from other Stepping Stone NDIS documentation.

When a member elects to receive services from providers other than Stepping Stone, we will work in partnership and collaborate with that provider in the best interests of our member.

In addition, staff performing support coordination functions will ensure that:

- Stepping Stone's risk register and/or conflict of interest register includes the ongoing potential conflict of interest
- They declare to members the potential conflict of interest of Stepping Stone being both support coordinator and a provider of other supports and affirm that the Stepping Stone will act as directed by the member and in their best interests.

Gifts, benefits and commissions and the NDIS

Stepping Stone 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 member. Further, Management Committee, staff or members must have no financial or other personal interest that could directly or indirectly influence or compromise the choice of provider or provision of supports..

References

- National Disability Insurance Scheme (Registered Providers of Supports) Rules 2013
- Terms of Business for Registered Providers (effective 1 July 2016)

Notes

This does not prevent providers determining which people they will accept as customers on the basis of considerations such as: provider capability; the consequences of NDIS price caps; location; work health and safety; customer mix; and, risk appetite.

