



NDIS Participants Conflict of Interest Policy and Procedure

ABN 55 956 904 691

Policy number:	32		
Responsible person:	Chief Executive Officer	Approved by Board on:	January 2018
Date written:	January 2018 Revised March 2024	Scheduled review date:	July 2026

Purpose

The purpose of this policy is to provide detailed instruction and guidance for staff in relation to any perceived and or real National Disability Insurance Scheme (NDIS) conflict of interests between Support Coordination, Plan Management and other NDIS services delivered by the organisation.

Scope

This policy applies to all Rural Lifestyle Options Australia employees who are responsible for the management and or delivery of Plan Management, Support Coordination, Supported Independent Living (SIL) and Social and Social and Community Participation Services.

Principles

The principles that underpin the RLOA Policy and Procedure include:

- Respect – demonstrating high level ethical practice.
- Professional Conduct – maintaining a high level of professionalism, competence and reliability to follow guidelines without exception.
- Integrity – demonstrating reliability, trustworthiness, truthfulness and honesty.
- Transparency – open and honest and consistent practice, documentation, and information security.

Procedural Statement

Rural Lifestyle Options Australia has been approved as both a registered Plan Management and Support Coordination provider and as a registered provider of a wide range of other support services under the NDIS Rural Lifestyle Options Australia is aware of the potential for real or perceived conflict of interest in performing both these roles for an individual.

The National Disability Insurance Agency (NDIA) requires that “If a registered Plan Management or Support Coordination provider is also a provider of other supports received by the participant, then the registered Plan Management or Support Coordination provider will need to have mechanisms in place for dealing with any

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conflicts of interest that might arise. These mechanisms would normally involve both policies and administrative procedures.”

Rural Lifestyle Options Australia may provide a range of NDIS funded supports to the one participant who resides in SIL accommodation. This may include SIL and Social and Community Participation support. To ensure that a potential conflict of interest is addressed the following steps will be implemented.

- The delivery of Social and Community Participation and SIL will be discussed with the participant and the Support Coordinator overseeing the participants supports and the appointed guardian / plan nominee.
- Separation of supports will be overseen by the Service Manager and will include separate quotes and separate service agreements for each support provided.
- Separate rosters will be developed and distributed for both SIL and Social and Community Participation supports.
- Wherever possible RLOA will engage a separate core group of Support Workers for each support provided.
- Where this is not possible the SIL Senior Support Worker and Service Manager will ensure all supports are provided in line with the participants individual NDIS goals.

This policy addresses these issues by using the following statements, actions and commitments:

1. Rural Lifestyle Options Australia Plan Management and Support Coordination activities and all other support services have well defined and separate administrative policy, procedures and work instructions for Rural Lifestyle Options Australia staff to follow.
2. Rural Lifestyle Options Australia staff will act in the best interests of participants to ensure they are informed, empowered and able to maximise choice and control.
3. Rural Lifestyle Options Australia utilise separate CRM platforms for individual supports and Plan Management/Support Coordination participants with access only available to employees who provide services in these specific areas.
4. Rural Lifestyle Options Australia staff are instructed to always identify to NDIS participants the following information:
 - a. Rural Lifestyle Options Australia offers Plan Management, Support Coordination, SIL, Social and Community Participation as well as a wide range of other supports under the NDIS.
 - b. The NDIS participant always has the choice to use either Rural Lifestyle Options Australia or other service providers in relation to Plan Management, Support Coordination, SIL, Social and Community Participation and/or other supports
 - c. There are many other registered Plan Managers and Support Coordinators under the NDIS and they are listed on the NDIS website and portal, Rural Lifestyle Options Australia staff are to purposely make NDIS participants aware of this.

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- d. There may, and often will be, other service providers who offer identical or similar supports to Rural Lifestyle Options Australia and that it is always the choice of the NDIS participant which service provider they choose.
 - e. Even if a person chooses to use Rural Lifestyle Options Australia as their Plan Manager, Support Coordinator, SIL or Social and Community Participation Provider they have a choice to change these supports as they deem necessary through the service agreement process.
 - f. Rural Lifestyle Options Australia will offer supports to NDIS participants regardless of whether they self-manage their plan, use the NDIA or any another registered Plan Manager.
 - g. Rural Lifestyle Options Australia staff will obtain confirmation that the above information has been disclosed to participant in order to maximise choice and control.
 - h. Rural Lifestyle Options Australia staff will document said conversation on the relevant client management platform.
- 5. Rural Lifestyle Options Australia staff will manage conflict of interests as they arise in line with NDIA Operational Guidelines or pricing arrangements and guidelines.
 - 6. Rural Lifestyle Options Australia staff will notify their manager of any conflicts as they arise as well as document it in the NDIS Participant Conflict of Interest register.
 - 7. NDIS participants are able to raise complaints using our grievance procedure or completing the feedback form available on the Rural Lifestyle Options Australia website.
 - 8. Rural Lifestyle Options Australia staff will under no circumstances accept any offer of money, gifts, services, commissions or benefits that would cause them to act in a manner against the interests of the participant
 - 9. Rural Lifestyle Options Australia staff are required to adhere to the Rural Lifestyle Options Australia Code of Conduct and Ethics, to avoid real or perceived conflicts of interest, and to record and report any which may be identified.
 - 10. Participants and/or families are asked to provide acknowledgement of receiving this information in writing to the Service Manager, Support Coordinator or Plan Manager.
 - 11. Participants and/or families are asked to notify NDIA about who they have chosen as their Support Coordinator.

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Related Legislation and Documentation

- National Disability Insurance Scheme Act 2013 (NDIS Act 2013)
- National Disability Insurance Scheme (Plan Management) Rules 2013
- National Disability Insurance Scheme (Supports for Participants) Rules 2013
- NDIS Operational Guidelines
- Disability Services Act 2006
- Mental Health Act Qld 2000
- NDIS Terms of Business for Registered Providers
- NDIS Price Guide
- NDIS Code of Conduct
- National Disability Insurance Scheme (Provider Registration and Practice Standards) Rules 2018
- Freedom of Information Act 1982
- Competition and Consumer Act 2010
- Aged Care Act 1997 (Cth)
- Information Privacy Act 2009; Public Records Act 2002 (Qld)
- Privacy Act 1988 (Cth), Privacy Amendment (Private Sector) Act 2000 (Cth)
- Privacy Amendment (Enhancing Privacy Protection) Act 2012 (Cth)
- Privacy Amendment (Notifiable Data Breaches) Act 2017 (Cth).
- RLOA Policies and Procedures

Quality Standards

- NDIS Quality and Safeguarding Framework

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