CONFLICT OF INTEREST POLICY

Policy approved	Sign:	Date 11/6/25

RECITALS:

Greystanes Disability Services (GDS) provides Supported Disability Accommodation, Supported Independent Living Services, Day Programs, Home Support Services and Support Co-Ordination for participants.

Greystanes has adopted practices to ensure that participants are not adversely affected by actual or perceived conflicts of interest in the relationships and interactions of our various services.

POLICY:

The purpose of this policy is to establish a framework for identifying, disclosing, and managing conflicts of interest in the provision of GDS, particularly concerning external contractors and individuals with disabilities.

This policy provides a clear and structured approach to managing conflicts of interest in GDS ensuring compliance with the NDIS Quality and Safety Commission's requirements. It emphasizes the importance of ethical practices and safeguarding the interests of individuals with disabilities.

A committee of three staff shall oversee property matters in the provision of Accommodation Services for people we support, which staff shall not provide any personal support services.

The different divisions of GDS providing different services to the same people, will enter into Collaboration Agreements, to ensure the smooth resolution of perceived or actual conflicts of interest.

There will always be an emphasis as early as possible, on actively promoting the instigation of professional mediation of any difference of opinion, conflict or dispute between GDS and a participant, or their family and or their nominee.

Greystanes Disability Services strives to act in the best interest of the people it supports, however, GDS acknowledges that it has a duty in relation to the management of any community home to act in the best interest of the majority of people where there is a contrary problem with one person, to the detriment or potential detriment of the majority of the others residing in a community home.

Accommodation Services Unit will act in subordination to all to other services and will not take part in any dispute between the other services and participants so that the other services shall take responsibility for resolving disputes or adverse perceptions. GDS has House Rules for its community

homes, implemented and managed by our Community Living Unit that provides Supported Independent Living Services.

SCOPE:

This policy applies to all employees, volunteers, board members, external contractors, and other stakeholders engaged in the delivery of disability services on behalf of Greystanes Disability Services.

DEFINITIONS:

Definition of Conflict of Interest: A conflict of interest exists when an individual's personal interests, relationships, or affiliations could potentially influence, or appear to influence, their decisions and actions in providing services to individuals with disabilities and their service providers.
This includes:

1. -Relationships between Greystanes Disability Services and participants or their family and or nominee.
2. Financial interests in external contractors or service providers.
3. Personal relationships with contractors, clients, or stakeholders that may affect professional judgment.
4. Secondary employment that may compromise service delivery to clients under the NDIS.

Please also refer to the attachment "Potential Internal and External Conflicts of Interest".

DOCUMENTATION:

Documenting and Reporting: in relation to conflicts between GDS and Participants, actual, potential or perceived, should be recorded in the NDIS Conflict of Interest Declaration form.

This declaration form then needs to be signed by the relevant parties to acknowledge that the information within the form is true and correct. This may be by the participant, authorised representative, nominee or guardian, or an employee or provider operations manager or director. GDS will then action the declaration and management plan by the agreed dates.

This declaration includes:

- Details of participant, provider or employee
- Identification of the conflict of interest -actual, potential or perceived.
- GDS management plan
- Acknowledgement and declaration
- Follow up review dates

The Conflict of Interest will then be recorded in the GDS register and assessed as per our mitigation action plan.

PRINCIPLES:

This policy is grounded in the following principles:
Integrity and Transparency: All individuals must act honestly and disclose any potential conflicts of interest.
Respect for Individuals with Disabilities: The rights and preferences of individuals with disabilities must be prioritised in all decision-making processes.

PROCEDURES:

Accountability: All stakeholders are responsible for identifying and managing conflicts of interest effectively.

1. Identification and Disclosure: Self-Disclosure: All employees and contractors must self-disclose any potential or actual conflicts of interest at the beginning of their engagement and whenever a conflict arises. These conflicts must be recorded in the Conflict-of-Interest Register.

2. Management of Conflicts of Interest: When a conflict of interest is identified, the following steps will be implemented:
   - Immediate Notification: The individual must notify their supervisor or the designated conflict of interest officer as soon as a conflict is identified.
   - Conflict of Interest Review Process: GDS will identify and assess the nature of the conflict, and its potential impact on service delivery, via the Conflict-of-Interest Review Process.
   - Conflict of Interest Mitigation Plan: The mitigation action plan will be used to mitigate the conflict, which includes:
     a. Reassignment of duties to prevent involvement in decisions related to the conflict.
     b. Monitoring the situation to ensure the conflict does not affect the delivery of services.
   - Documentation: All identified conflicts and actions taken must be documented for transparency and future reference.

3. External Contractors: All external contractors providing services must adhere to this policy and are required to disclose any potential conflicts of interest prior to and during their engagement.

   The GDS reserves the right to terminate contracts if conflicts are not appropriately managed or disclosed.

4. Reporting and Accountability: Incident Reporting - All identified conflicts of interest must be reported to the appropriate supervisor or management team. The conflict will then be recorded in the register and actioned via CareMaster.

   Review Process: Regular audits will be conducted to ensure compliance with this policy.

5. Protection Against Reprisal: Individuals who report conflicts of interest in good faith are protected from reprisal. Any acts of reprisal against individuals who disclose conflicts will be subject to disciplinary measures.

6. Training and Awareness: All staff will receive training on this policy, and contractors will receive a copy of this policy, including how to identify and manage conflicts of interest, ensuring that everyone understands their responsibilities.

LEGISLATION

Australian Community Industry Standard: 2023
Corporations Act 2001
Fair Work Act 2009
NDIS Practice Standards: 2021
NDIS (Provider registration and practice standards) Rules 2018
NDIS Act 2013
Disability Discrimination Act 1992
Disability Inclusion Act 2014 (NSW)
Health Records and Information Privacy Act 2002 (NSW)
Privacy and Personal Information Protection Act 1998
Work Health & Safety Act 2011
Ombudsman Act 1974 (NSW)

REFERENCES:

NDIS Quality and Safeguards Commission

Level 1, 121 Henry Street Penrith NSW 2750

Phone: 1800 035 544

Email: contactcentre@ndiscommission.gov.au

ndiscommission.gov.au

NSW OMBUDSMAN

Level 24, 580 George St,

Sydney NSW 2000.

(02) 9286 1000

Free call: 1800 451 524

Email: nswombo@ombo.nsw.gov.au

www.ombo.nsw.gov.au

FAIR WORK NSW Sydney Office:

Level 11, Terrace Tower

80 William Street

East Sydney, NSW, 2011

PH:1300 799 675

International: +61 293 081 808

Email: lodge@fwc.gov.au