

Conflict of Interest Policy

Purpose: We acknowledge that conflicts of interest may arise from time to time. This policy is designed to ensure that all such conflicts are identified, disclosed and managed in a rigorous and transparent way so that the suppliers and customers of Access Disability have confidence in the integrity, legitimacy, impartiality of our business.

A **conflict of interest** is defined by the Australian Research Council (ARC) as a situation in which someone in a position of trust has competing professional or personal interests. Such competing interests could make it difficult for an individual to fulfil his or her duties impartially, and potentially could improperly influence the performance of their official duties and responsibilities.

An **apparent** (or perceived) conflict of interest is defined by the Australian Research Council (ARC) to exist where it appears that individual private interests could improperly influence the performance of their duties and responsibilities whether or not this is, in fact, the case. Individuals must be conscious that perceptions of conflict of interest may be as important as an actual conflict.

A **potential** conflict is defined by the Australian Research Council (ARC) as a conflict of interest that arises where an individual has a private interest which is such that an actual conflict of interest would arise if the member were to become involved in relevant (that is conflicting) official duties and responsibilities in the future.

Rebecca Styles is owns 50% of Difference Health Group. This business provides Allied Health Treatment Services (Exercise Physiology, Physiotherapy and Psychology) to a range of customers, including injured workers in receipt of workers compensation, who are referred by their GP. Difference Health Group prides itself on displaying integrity and retaining its good reputation in the community.

In relation to workplace rehabilitation services, this business currently works with other rehabilitation providers, other treatment providers, general practitioners and the public however the focus is in providing only treatment based services (that are provided under a Psychology, Physiotherapy and Exercise Physiology Enhanced Primary Care plan).

Difference Health Group will continue to operate as normal, with the operations being overseen by Ben Styles (the other Owner).

In relation to Access Disability offering Support Coordination and Therapy Services, this conflict will be managed by ensuring the participant accessing Support Coordination services is provided with a range of alternative services so that they can choose the best service that meets their needs. The reception area has several fliers of similar service providers and a list of all registered NDIS providers which will be provided to the participant when developing their plan of supports. As per Access Disability's current process, all staff are to raise conflict of interest

Conflict of Interest Policy

issues with their manager or at a team meeting. All staff are required to raise these issues as per their signed contract of employment and code of conduct.

Access Disability's Support Coordination services will be run separate to the team to enable independence.

Procedure:

How Access Disability will minimize any actual or perceived conflict of interest:

- When referrals are made between the businesses full disclosure is made to all the stakeholders (worker, employer and insurer) that there is one owner who has a financial interest in both Access Disability and Difference Health Group.
- WorkCover NSW: The worker is offered the choice to choose their own rehabilitation provider and/ or treatment provider/s. This choice is facilitated through liaison with the Nominated Treating Doctor.
- NDIS Support Coordination: The participant is offered the choice to choose their own therapy provider and other supports independent of Access Disability. This choice is facilitated through liaison with their Support Coordinator, LAC and NDIS Planner.
- A case note, documenting an actual or perceived conflict of interest is made on the file (in insight case management software or Nookal).
- The worker cannot receive treatment and workplace rehabilitation services nor support coordination and therapy services from the same allied health professional.
- Where possible, Access Disability and Difference Health Group/ Life InMotion Support Coordination and Access Disability's therapy services will operate independently, with their own staff, procedures, KPIs and meetings.
- If any actual or perceived conflict of interest arises for WorkCover NSW work, then this will be investigated by Sarah Strong, who does not have a financial interest in Difference Health Group and who is responsible for management of the HWCA/ WorkCover NSW & ACT accreditations.
- If any actual or perceived conflict of interest arises for Support Coordination work, then this will be investigated by Access Disability Team Leader, who has been employed to manage the Support Coordination services and maintain this conflict of interest.
- If a complaint is lodged in relation to Conflict of Interest and this is unable to be investigated by the nominated party (for example if they are involved in the case or decision), then Access Disability will request an impartial third party to investigate this matter. This third person will be a consultant who has significant experience in provision of the services where a conflict is and who is familiar with the Workplace Rehabilitation Principles and/ or NDIS Quality and Safeguards Framework.
- Conflict of Interest to be assessed by the Independent Auditor during the annual internal/ self auditing process (for WorkCover NSW accreditation only).