



# WESTERN COORDINATION PLUS

## Conflict of Interest Policy

### 1 Policy

Western Coordination Plus 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.

### 2 Procedures

#### Introduction

As a registered provider of supports under the National Disability Insurance Scheme, Western Coordination Plus 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

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

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

All Employees / Contractors will act in the best interests of NDIS participants, 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 / Contractors will ensure that Western Coordination Plus proactively manages perceived and actual conflicts of interest in service delivery. Employees / Contractors 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 Western Coordination Plus) is transparent and promotes choice and control.

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". (See note below.)

#### Managing conflict of interest in plan management and support coordination

Where separation of functions is viable:

- Western Coordination Plus is responsible for plan management and support coordination only.
- The team reports to the Director.



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- Participants will be presented with a range of choices about providers of supports and not only Western Coordination Plus and staff will not seek to influence the Participant to select Western Coordination Plus.
- Choices offered will be documented on participant file in the case notes.
- Western Coordination Plus will not provide plan management or support coordination to own family members who are in receipt of NDIS plans. WCP staff will purchase these services from external service providers.

Where complete separation of functions is non-viable:

Members of the Western Coordination Plus 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 Participants the potential conflict of interest of Western Coordination Plus being both plan manager or support coordinator and a provider of other supports and affirm that the organisation will act as directed by the Participant and in the best interests of the Participant
- Participants will be presented with a range of choices (wherever available) about providers of supports and not only Western Coordination Plus and staff will not seek to influence the Participant to select Western Coordination Plus.
- Where other providers do not currently have spare capacity, Participants will be presented with options regarding support delivery in the future, including whether they would like to be weight-listed with other providers.
- Brief notes will be made in participant's file confirming the advice / choices given to the Participant.

## **Gifts, benefits, and commissions and the NDIS**

Western Coordination Plus 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 participant. Further, Employees / Contractors 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 / Contractors or Western Coordination Plus.

## **3 References**

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