



**myEmpowerPlan**

NDIS SUPPORT SPECIALISTS



# Conflict of Interest Management Policy

Version 1.0 | February 2026

## Introduction

All employees of *myEmpowerPlan* are expected to perform their duties fairly, in an unbiased manner and avoid acting out of self-interest or for personal gain. As an organisation that provides services to some of Australia's most vulnerable citizens, *myEmpowerPlan* recognises the importance of strict management of potential conflict of interests as part of everyday business.

## Contents

Scope and Purpose	2
Definition of a Conflict of Interest	2
Potential for a Conflict of Interest	2
Disclosure of a Conflict of Interest	3
Managing Conflicts of Interest	3
Legal and Regulatory Requirements	3

## Scope and Purpose

This policy applies to all employees of *myEmpowerPlan*. This policy has been developed to provide employees with an understanding of what a conflict of interest is, what conflicts are likely to arise in the provision of NDIS services at *myEmpowerPlan* and how to identify and respond to conflict of interest events.

## Definition of Conflict of Interest

A conflict of interest occurs when an employee's financial, or professional interests interfere with their ability to make objective decisions in the best interests of the NDIS participant. An interest can be defined as anything that can have an impact on any individual, both positive and negative. A conflict of interest may be:

- **Actual** – a conflict of interest that occurs when a person's private interests directly clash with their duties as an employee. For example, a *myEmpowerPlan* employee may refer a client to a provider they have a financial relationship with.
- **Potential** – a conflict of interest where a person's private interests *may* clash with their duties as an employee, even if no actual conflict of interest exists yet. For example, a *myEmpowerPlan* employee may also be employed as an NDIS provider with another company.
- **Perceived** – occurs when a person's private interests may appear to clash with their duties as an employee, irrespective of whether there is an actual conflict of interest or not. For example, a *myEmpowerPlan* employee may recommend an NDIS participant engage the services of a specific provider from their own organization.

## Potential Conflicts of Interest

Conflicts of interest may arise in the following situations:

- **Financial Conflicts** - Employees or their close associates hold financial interests in services or providers they recommend to NDIS participants.
- **Personal Conflicts** - Personal relationships (e.g., family, friends) with service providers or participants that could influence decisions.
- **Dual Roles** – An employee also provides direct services to the participant, leading to potential conflicts between managing the plan and delivering the service.

## Disclosure of a Conflict of Interest

All potential or actual conflicts of interest must be disclosed as soon as they are identified. All employees of *myEmpowerPlan* are responsible for the identification and disclosure of their own conflicts of interest. Disclosures should be made to the relevant supervisor or compliance officer. When a potential conflict arises, plan managers must immediately inform the organization in writing, providing relevant details. Plan managers should review and update their disclosures regularly, especially when their roles or relationships change.

## Managing a Conflict of Interest

Once a conflict is identified, management must be timely, fair and effective. Both employees and managers of *myEmpowerPlan* have important roles to play in the management of conflicts of interest. Employees must adhere to the NDIS Code of Conduct, which mandates ethical behaviour and transparency in all dealings. Employees must undergo regular training to identify, understand, and manage conflicts of interest.

Upon identification of a conflict of interest, employees involved must complete the Conflict of Interest Register and fill out a Conflict of Interest Declaration. Any NDIS participant who's service delivery is impacted by a conflict of interest must be notified as soon as possible. If necessary, they may be reassigned a new, unbiased plan manager. If required, an independent decision maker or reviewer may be contacted to assist with managing a conflict of interest.



## Legal and Regulatory Requirements

NDIS service providers are required to adhere to the **NDIS Code of Conduct**, which mandates the maintenance of high ethical standards. The **NDIS Practice Standards** also require that service providers implement systems to manage conflicts of interest effectively. Failing to do so could result in sanctions, including removal from the NDIS Quality and Safeguards Commission's register.

This policy will be reviewed annually to ensure its effectiveness in managing conflicts of interest. Any breach of this policy will be addressed according to the organization's disciplinary procedures.

**Date:** 15 February 2026

**Date for Review:** 15 February 2027

**Written By:** Renee Blaine