

CONFLICT OF INTEREST POLICY AND PROCEDURE

The purpose of this policy and procedure is to demonstrate Clover Care Pty Ltd's commitment to managing conflicts of interest in an open and transparent manner. This policy and procedure apply to Clover Care Pty Ltd's Management Team and meets relevant legislation, regulations and standards.

POLICY

Clover Care Pty Ltd acknowledges that failure to respond to actual or potential conflicts of interest can damage the reputation of and community confidence in Clover Care Pty Ltd. It may also have legal ramifications.

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

Clover Care Pty Ltd aims to act in accordance with its values; and comply with its obligations as a registered provider of supports under the NDIS.

Definitions

1. Registered Plan Management Provider - an NDIS provider who is registered to manage the funding for supports in NDIS participants' plans. Providers must be registered to provide Plan Management. Plan Management Providers are responsible for purchasing supports identified in participants' plans (including paying any applicable indirect costs, such as taxes; receiving and managing funding provided by the Agency; and acquitting funding provided by the Agency).
2. Registered Support Coordination Provider – an NDIS provider who is registered to help NDIS participants to identify, connect with and work with service providers who provide the supports best suited to them. Providers must be registered to provide Support Coordination.

PROCEDURES

- As a registered provider of supports under the NDIS, Clover Care Pty Ltd 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.
- All staff will act in the best interests of NDIS participants and other participants, ensuring that they are informed, empowered, and able to maximise choice and control.
- Clover Care Pty Ltd will ensure that when providing supports to NDIS participants, any conflict of interest is declared and any risks to participants are mitigated.
- Staff 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 Clover Care Pty Ltd) is transparent and promotes choice and control.

Managing conflict of interest in plan management and support coordination

Staff performing plan management and support coordination functions will ensure that:

- the organisation's Risk Register includes the ongoing potential conflict of interest related to delivering these services along with other NDIS supports.
- they declare the potential conflict of interest of Clover Care Pty Ltd being both plan manager or support coordinator and a provider of other supports to participants and affirm that the organisation will act as directed by the participant and in the best interests of the participant; and
- participants are presented with a range of choices about providers of supports. Staff will not seek to influence the participant to select Clover Care Pty Ltd over other organisations.

Gifts, benefits and commissions and the NDIS

Clover Care Pty Ltd and 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.

Staff 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 of Clover Care Pty Ltd.

MONITORING AND REVIEW

Clover Care Pty Ltd Management Team will review this policy and procedure at least annually. This process will include a review and evaluation of current practices and service delivery types, contemporary policy and practice in this clinical area, the Incident Register and will incorporate staff, participant and another stakeholder feedback. Feedback from service users, suggestions from staff and best practice developments will be used to update this policy.

Clover Care Pty Ltd Continuous Improvement Plan will be used to record and monitor progress of any improvements identified and where relevant feed into Clover Care Pty Ltd service planning and delivery processes.