



# Conflict of Interest Policy and Procedures

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"I have a right to receive supports that are provided with an intention that it is in my best interests" - client voice

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## Introduction

Play Grow Flourish management and staff are committed to effectively identifying, disclosing, and managing any actual, potential, or perceived conflicts of interest in order to protect the integrity of Play Grow Flourish and to manage any associated risk.

## Scope

This policy applies to Management, staff, any person representing Play Grow Flourish.

## Principles

Play Grow Flourish aims to provide ethical services with integrity that provides clients and their carers with assurance and transparency in relation to any perceived or real conflict of interest.

## Policy

This policy has been developed to provide direction to address actual, potential or perceived conflicts of interest affecting Play Grow Flourish and their clients.

It is the policy of Play Grow Flourish as well as a responsibility of staff, that ethical, legal, financial, or other conflicts of interest be avoided and that any such conflicts (where they arise) do not impact professional or organisational obligations. This will be conducted by ensuring that:

- Organisational or ethical values do not impede a client's right to choice and control.
- As individual conflicts arise, they are identified, reported, acted upon, and analysed.
- Advice to a client about support options is transparent and provides all opportunities.
- All clients are treated equally, and that no client is given preferential treatment above another in the receipt of provision of supports.

## Play Grow Flourish will manage conflicts of interest by requiring staff to:

- Remain aware of the potential for conflicts of interest to arise which may affect their ability to exercise professional discretion and unbiased judgment.
- Avoid conflicts of interest where possible
- Do not provide financial advice to clients at any time.



- Identify and disclose any conflicts of interest.
- Consult with Management where potential conflicts of interest do arise to find an appropriate resolution.
- Carefully manage any conflicts of interest where they have been reported and analysed.
- Follow this policy and respond to any breaches.

## Procedure

### Identification and disclosure of conflicts of interest

Once an actual, potential, or perceived conflict of interest is identified, a Conflict of Interest Form must be completed by the person declaring the conflict within 24-hours. The declared conflict of interest will then be entered onto the Conflict of Interest Register.

The Director must maintain the Conflict of Interest Register. The register must record all information related to the conflict of interest (including the nature and extent of the conflict of interest and any steps taken to address it).

### Action required to manage conflicts of interest

In deciding what approach to take, the Director and discloser will consider:

- Whether the conflict needs to be avoided or simply documented
- Whether the conflict will realistically impair the disclosing person's competency and capacity to impartially participate in decision-making
- Alternative options to avoid the conflict.
- If accepted, what management strategies will be undertaken.
- Play Grow Flourish's resources.
- The possibility of creating an appearance of improper conduct that might impair confidence in, or the reputation of, the business.

The action and result of the decision will be recorded in the Conflict of Interest Register for future reference.



### Multiple relationships

A multiple or dual relationship is a situation where multiple roles exist between a staff member and a client. Multiple relationships can occur when: a personal and professional relationship exists between a staff member and client, when a staff member has a professional or personal relationship with a person closely related or connected to the client, or when multiple professional relationships exist between the staff member and client e.g., Staff member and Support Coordinator.

Play Grow Flourish staff should avoid engaging in multiple relationships that may impair their competence, effectiveness, or objectivity.

Where multiple relationships with clients are unavoidable due to over-riding ethical considerations, organisational requirements, or by law, staff will:

- Declare the multiple relationship using the Conflict of Interest Form
- Consult with the Director to attempt to find an appropriate resolution that is in the best interest of all involved parties.
- Clarify professional boundaries with the client from the outset of the professional relationship.

### Multiple support that includes Support Coordination

When delivering Support Coordination, staff must only recommend and provide supports that are appropriate to the needs of clients. This means providing truthful information about the:

- Capacity, qualifications, training and professional affiliations of providers and their staff
- Supports, services or products delivered by providers, including Play Grow Flourish; and
- Full costs of supports and what these include.

Information provided to support clients' decision making may include quotes, cost breakdowns for different support options; other people's feedback about supports they have received and the risks or different support options.

### Delivery of additional supports

- Staff must ensure that they provide each client with three options when offering support options. Play Grow Flourish can be one the options, however all options must be documented within the Provider Options Form.
- Play Grow Flourish must include and monitor the conflict of interest related to delivering Support Coordination along with other NDIS supports in the client's progress notes and report to the Director where an issue emerges.
- This conflict of interest must be declared to all clients using Play Grow Flourish Support Coordination services, as part of their intake and assessment process



through the Appendix A attached to the service agreement. Strategies to address the conflict must also be explained. Should a client choose to use another provider because of this conflict, staff must respect their decision.

Strategies that Play Grow Flourish has in place to manage the conflict of interest involved in delivering Support Coordination along with other NDIS supports include:

- Maintaining a clear separation of responsibilities between Support Coordination staff and other staff.
- Providing clients with the option of several providers for each type of support they are seeking.
- Where only one option of provider can be suggested for a particular support, thoroughly documenting the rationale for this, and reviewing it regularly.
- Keeping detailed records of any issues that arise with supports provided to a client by Play Grow Flourish, including the actions taken and how the issue was resolved.
- Continually working with clients and other areas of Play Grow Flourish to understand how well their supports are meeting their needs and adjusting support delivery before issues emerge.
- Explaining the difference between Support Coordination and other supports funded in clients' NDIS plans, including the requirement that supports provided be reasonable and necessary; and
- Explaining that any choice clients make about providers of other supports will not impact the provision of their Support Coordination.

### Compliance with this policy

If there is reason to believe that a person has failed to comply with the policy, then an investigation of the circumstances will be conducted.

If it is found that that person failed to disclose a conflict of interest, then the Director may commence disciplinary action.

If a staff member suspects a failure to disclose a conflict of interest, they must notify the Director, who will address it in confidence with the identified person.

### Responsibilities

For the purpose of this policy, the Management Team includes the Director, Executive Team Leader and Human Resources Manager.

#### Management is responsible for:

- Seeking external professional advice/opinion on conflicts that include the Director.
- Reviewing this policy on an annual basis to ensure that the policy is operating effectively.





- Reviewing the *Conflict of Interest Register* and determining appropriate management strategies.
- Monitoring compliance with this policy.
- Documenting the Conflict of Interest on the *Master Register*
- Ensuring adequate staff induction and ongoing training regarding conflict of interest.
- Overseeing internal audits to ensure compliance with compliance with conflict of interest procedures.
- Promoting culture of transparency and accountability throughout the organisation.

### Shift Managers are responsible for:

- Ensuring staff are trained in what constitutes a conflict of interest and reporting process.
- Reviewing the declared conflict of interest and actioning as appropriate
- Monitoring actions being undertaken to manage the conflict of interest.
- Escalating unresolved or complex issues to Management.
- Providing feedback to management regarding the effectiveness of current conflict management strategies.

### Staff are responsible for:

- Identifying and disclosing conflicts of interest through the completion of the Conflict of Interest form. This must be provided to Management within 24 hours of identifying the actual/potential or perceived conflict of interest.
- Following the direction provided by the Shift Manager or Management in addressing the conflict of interest.
- Understanding potential indirect conflicts, including relationships with other providers or businesses.
- Maintaining confidentiality when disclosing personal interests or those of others.
- Participating in refresher training as required to stay informed on conflict of interest policy.
- Maintaining professional boundaries with clients and avoiding situations that could create and avoid situations that could create a real, potential or perceived conflict of interest (e.g. accepting gifts or favours)
- Not recommending external providers or services based on personal relationships.
- Promptly reporting any situation where they feel there may be a conflict of interest, including friendships or family ties that could influence their work.
- Maintaining appropriate professional boundaries with ex-employees and not engaging in discussions that may influence internal operations or client decisions.



- Reporting any concerns where former employees may be attempting to access confidential information, influence client choices or represent themselves as still associated with Play Grow Flourish.

### Definition of conflicts of interests

A conflict of interest occurs when a person's individual interests, conflict with their responsibility to act in the best interests of the business or client.

Personal interests include direct interests, as well as those of family, friends, or other organisations a person may be involved with or have an interest in.

It also includes a conflict between a staff member's duty and another duty that the staff member has (for example another occupation). A conflict of interest may be actual, potential, or perceived and may be financial or non-financial.

These situations present the risk that a person will make a decision based on, or affected by, these influences, rather than in the best interests of Play Grow Flourish or their clients.

Examples of a Conflict of Interest may include (but not limited to):

Gifts and Benefits	Play Grow Flourish management and staff must not accept any offer of money, gifts, services, or benefits that would cause them to act in a manner contrary to the best interest of a client.
Influencing Choice and Commissions	Play Grow Flourish will not have any financial or any other personal interest that could directly influence or compromise the choice of provider or provision of support to a client. This includes the obtaining or offering of any form of commission.
Referring clients to associated Providers	Play Grow Flourish will always ensure the client is provided options without influence when offering support options.
Referring clients to internal service offering	Play Grow Flourish will ensure that where a client requires multiple supports, and one of those services is available through Play Grow Flourish, three options will be provided.

### Review

Play Grow Flourish will review each policy through internal audit processes, client feedback or as contextual drivers determine the need for a review.



# PLAY GROW FLOURISH PTY LTD

NDIS Support services

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January 2024	1.0	Director	Nil
Review Date:	Version No:	Approved By:	Amendments:
May 2025	2.0	Human Resources Manager	Updated responsibilities. See Master Register for details.

