

## Conflict of Interest Policy in Service Delivery

Independent Living Centre Tasmania (ILCT) is committed to high standards of ethical conduct and accordingly this policy has been developed to provide a framework for conducting its business and delivering its services in a fair, transparent, accountable and impartial manner. Clients are the focus of Independent Living Centre operations.

In the event, that ILCT staff members work across different agencies, this will need to be managed effectively. A discussion will occur to identify these conflicts and expectations.

As a registered provider of supports under the National Disability Insurance Scheme, Independent Living Centre Tasmania has responsibilities in relation to:

- managing conflicts of interest generally
- managing conflicts of interest in Allied Health Services and Plan Management, and
- offering or receiving gifts, benefits and commissions.

Policy context - This policy relates to	
Standards	NDIS Practice Standards
Legislation	National Disability Insurance Scheme (NDIS Practice Standards) Rules 2018 National Disability Insurance Scheme (Code of Conduct) Rules 2018 National Disability Insurance Scheme (Provider Registration and Practice Standards) Rules 2018 National Disability Insurance Scheme (Quality and Safeguards Commission) Rules 2018 National Disability Insurance Scheme (Protection and Disclosure of Information—Commissioner) Rules 2018
Contractual Obligations	NDIS Quality and Safeguards Commission Registration
Organisation Policies	Employee & Volunteer code of conduct Privacy
Forms, record keeping, other documents	Client progress note & other clinical documents – CRM database & Sharepoint Plan manager progress note & other documentation – Sharepoint, Xero, Brevity, PACE system & PRODA Incident report

Independent Living Centre Tasmania aims:

- To act in accordance with our values;
- To comply with its general and specific obligations as a registered provider of supports under the National Disability Insurance Scheme.

Independent Living Centre Tasmania provides a range of services which clients are able to access including but not limited to a state-wide Information Service, Allied Health Services and Plan Management.

Independent Living Centre Tasmania will remain impartial and unbiased when providing information and advice as part of the Information Service, providing clients with a range of suppliers for relevant assistive technology/products and/or services they may wish to access.

NDIS participants and other clients will be given choice and control over services they may wish to access through the Independent Living Centre as well as the option to seek alternative services providers. NDIS participants will be encouraged to consider a variety of service provider options available, enabling them to make informed choices about their service delivery. ILCT and its staff will ensure that when providing supports to participants under the NDIS, including when offering allied health and plan management any conflict of interest is declared and any risks to participants are mitigated.

Independent Living Centre and its employees will act in the best interests of participants of the NDIS, ensuring that participants are informed, empowered and able to maximise choice and control. ILCT staff will not (by act or omission) constrain, influence or direct decision making by a person and/or their family so as to limit that person's access to information, opportunities and choice and control.

A conflict of interest may affect a person's judgement as to what is in the organisation's interest or may lead to a bias in their decision making. It is not always possible to avoid a conflict of interest. A conflict of interest is not necessarily unethical or wrong. It is important that any actual, perceived or potential conflict of interest is identified, disclosed, effectively managed and monitored. Management of conflicts of interest must be fair, transparent, accountable and free from bias.

Employees will ensure that Independent Living Centre Tasmania proactively manages perceived and actual conflicts in service delivery.

Independent Living Centre Tasmania staff will :

- Enable participants/clients to make informed choices;
- Ensure that its organisational and ethical values do not impede participants right to choice and control;
- Ensure that it does not direct or influence a participant or client's choice of services or supports;
- Ensure that advice to a participant/client about support options (including those not delivered directly by ILCT) is transparent and promotes choice and control;
- Not accept any offer of money, gifts, services or benefits that would cause them to act in a manner contrary to the interests of the participant;
- Not obtain or offer any form of commission;
- Manage, document and report on individual conflicts of interest as they arise;
- Put the interests of the participant/client first.

Independent Living Centre Tasmania aims to ensure that all participants/clients are treated equally, and that no participant/client is given preferential treatment above another in the receipt or provision of supports.

Independent Living Centre Tasmania has stringent conflict and complaints resolution policies in place that will ensure:

1. Staff are free to advocate for their respective employer and participants/clients without actual or apparent fear of recourse; and
2. Participants/clients may freely raise concerns or complaints and choose other service providers without actual or apparent fear of recourse.

#### Managing conflict of interest in: Plan Management & Allied Health

When a potential or actual conflict of interest are identified in relation to the provision of Allied Health Supports and Plan management, the Allied Health Manager or their delegate or Plan Manager will contact the participant to discuss and declare this openly. Independent Living Centre Tasmania will affirm that the organisation will act in the best interests of the participant.

Staff will ensure that:

- they declare to participants the potential conflict of interest of Independent Living Centre being both Plan Manager or Allied Health 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.
- Where other providers are available, participants will be presented with a range of choices about providers of supports and not only ILCT and staff will not seek to influence the customer to select Independent Living Centre Tasmania.
- Where other providers are not available, such as some regional and remote areas where only one provider exists, participants will: be presented with options regarding self-employment, and/or emphasise feedback and complaint mechanisms and the right to support from an advocate should the participant have any concerns about supports provided
- 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 wait listed with other providers
- Brief notes will be made in Independent Living Centre CRM Database confirming the advice given to the participant.