

Core Module Manual

Full Care Lifetime

CONFLICT OF INTEREST POLICY AND PROCEDURE

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

POLICY

Full Care Lifetime acknowledges that failure to respond to actual or potential conflicts of interest can damage the reputation of and community confidence in Full Care Lifetime. 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.

Full Care Lifetime 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, Full Care Lifetime 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.
- Full Care Lifetime 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 Full Care Lifetime) is transparent and promotes choice and control.

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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 Full Care Lifetime 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 Full Care Lifetime over other organisations.

Gifts, benefits and commissions and the NDIS

Full Care Lifetime 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 Full Care Lifetime.

MONITORING AND REVIEW

Full Care Lifetime 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.

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