



NDIS CONFLICT OF INTEREST POLICY AND PROCEDURE

Policy Code	NDISP001.01
Person Responsible	Director
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1.0 PURPOSE AND SCOPE

This policy outlines the process AMPEY must take in managing any perceived or actual conflicts of interest in relation to the contracting and delivery of supports to participants of the National Disability Insurance Scheme (NDIS).

AMPEY is committed to ensuring that any potential conflicts of interest are identified and managed in a manner that ensures participants retain choice and self-determination in relation to the use of their funding and the integrity of the AMPEY is protected.

Under the NDIA Terms of Business, registered providers must not constrain, influence or direct decision making by a person with a disability and/or their family so as to limit that person's access to information, opportunities and choice and control.

This policy and procedure applies to the all AMPEY services.

2.0 DEFINITIONS

Conflict of Interest: A conflict of interest may occur in the situation where AMPEY PTY LTD a registered provider enters into a Service Agreement with a participant to deliver Plan Management, or Coordination of Supports and other funded supports included in a participant's plan.

3.0 POLICY

Conflict can occur between the AMPEY's interest and the participant's interest. For example, a conflict of interest exists when an AMPEY is in a position to benefit by both managing a participant's plan *and* providing Support Coordination and other types of supports to a participant, when it may not be in the participant's best interests to receive both from the same provider.

A conflict of interest can occur when AMPEY PTY LTD , through their Plan Management or Support Coordination (where provided), refers the participant to another service offered by AMPEY when there are alternative AMPEYs that

provide the same type of service, and which may better meet the needs of the participant. In some locations there may be limited service options available, but the participant has a right to know what options are available to them.

In these circumstances, it is incumbent on AMPEY to ensure participants are provided with transparent information and advice about the full range of options available to them, so they can exercise informed choice. There may also be occasions when a participant exercises their choice to receive both types of supports from the same AMPEY because they prefer to deal with a single provider or have an on-going trusting relationship with that provider. Once the participant makes an informed choice and the NDIA has been consulted where necessary, the conflict of interest will have been appropriately dealt with.

4.0 PROCEDURE

Managing Conflicts of Interest

When a potential conflict of interest has been identified, and before a service quote or

Service Agreement is developed, AMPEY must:

- Advise the participant of the potential for a conflict of interest and explain how this can occur
- Advise the participant of alternative options for receiving Plan Management, Coordination of Supports or other supports from different providers
- All advice and information provided to a participant about support options (including those not directly delivered by AMPEY PTY LTD) will be transparent and promote choice and control
- Ensure the participant understands the potential conflict of interest by asking them to explain in their own words their understanding of what it means (this ensures informed consent)
- Obtain the participant's consent to proceed with the service quote or Service Agreement by drawing to their attention the consent clause contained in the Service Agreement with AMPEY and the participant
- It may be appropriate for the Director to contact the NDIA for advice before proceeding.
- AMPEY will manage conflicts of interest as they arise in line with NDIS Operational Guidelines or pricing arrangements and guidelines.
- Staff providing Plan Management or Support Coordination will not have any role in the coordination of delivery of direct services for the participants they are supporting
- Where AMPEY operates as a financial intermediary, systems will be in place to ensure funds that are allocated to participants remain independent of funds used for other AMPEYal purposes and will only be used for the purposes intended. Clear guidelines will be in place



regarding the allocation of NDIS funds, the independence of funds and the process of managing a participant's funds as stipulated in the participant's plan.

- AMPEY staff or volunteers will 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.
- AMPEY staff or volunteers will 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.

Recording a Conflict of Interest

- All identified conflicts of interest are to be reported to the Director who will record them in the Conflicts of Interest Register.
- The Conflicts of Interest Register will document:
 - The participant's name;
 - The participant's NDIS number;
 - The nature of the conflict of interest; and
 - A summary of how the conflict was managed, including any advice from the NDIA.
- The Register will be routinely reviewed.

POLICY AMENDMENT RECORD		
DATE	BRIEF DESCRIPTION OF AMENDMENT	AUTHORISED

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