

## **Conflict of Interest Policy**

---

### **1. Introduction**

#### **1.1 Purpose**

This Policy and the Policies and Procedures and related documentation set out in section 1.5 below (**Related Documentation**) supports CDNI Care to apply the Conflict of Interest NDIS Practice Standard (Specialist Disability Accommodation Module).

#### **1.2 Policy Aims**

CDNI Care is committed to ensuring each Client's right to exercise choice and control over other NDIS support provision is not limited by their choice of specialist disability accommodation dwelling.

#### **1.3 NDIS Quality Indicators**

In this regard, CDNI Care aims to demonstrate each of the following quality indicators through the application of this Policy and the relevant systems, procedures, workflows and other strategies referred to in this Policy and the Related Documentation:

- (a) Organisational policies are in place that detail how perceived or actual conflicts of interests are managed. The conflict of interest policies are made available to Clients in the language, mode of communication and using terms which each Client is most likely to understand.

#### **1.4 Scope**

- (a) This Policy applies to all CDNI Care's Clients.
- (b) All permanent, fixed term and casual staff, contractors and volunteers are required to take full responsibility for ensuring full understanding of the commitments outlined in this Policy.

#### **1.5 Related Documentation**

The application of the above NDIS Practice Standard by CDNI Care is supported in part by and should be read alongside the Policies and Procedures and related documentation corresponding to this Policy in the Policy Register.

---

## **2. Definitions**

### **2.1 Definitions**

In this Policy:

**CDNI Care** means CDNI Care PTY LTD ABN 32 640 960 658.

**Client** means a client of CDNI Care (including an NDIS participant) and includes current, future and former Clients.

**Key Management Personnel** means Armour Ncube, Saneliso Sibanda, Blessing L Ncube, Beatitute N Ncube and other key management personnel involved in CDNI Care from time to time.

**Legislation Register** means the register of legislation, regulations, rules and guidelines maintained by CDNI Care.

**Policy Register** means the register of policies of CDNI Care.

<b>Approved By:</b>	The board of CDNI Care Pty Ltd	<b>Version</b>	1
<b>Approval Date:</b>	August 2020	<b>Next Scheduled Review</b>	August 2022

**Principal** means Saneliso Sibanda.

**Procedures** means the procedures which are intended to clarify the responsibilities of the board, Principal, Key Management Personnel and other Workers and make explicit the underlying principles of this Policy.

**Related Documentation** has the meaning given to that term in section 1.1.

**Worker** means a permanent, fixed term or casual member of staff, a contractor or volunteer employed or otherwise engaged by CDNI Care and includes the Principal.

Words and phrases not defined in this Policy will have the meaning given to them in the Legislation.

---

### 3. Policy

#### 3.1 General

- (a) CDNI Care and its Workers will ensure that when providing support to Clients under the NDIS, any conflict of interest is declared and any risks to Clients are mitigated.
- (b) All Workers will act in the best interests of the Clients, ensuring that they are informed, empowered and able to maximise choice and control. Workers will not (by act or omission) constrain, influence or direct decision-making by any Client and/or their family so as to limit that person's access to information, opportunities, and choice and control.
- (c) Workers will ensure that CDNI Care proactively manages perceived and actual conflicts of interest in service and support delivery. Workers will:
  - (1) manage, document and report on individual conflicts as they arise, and
  - (2) ensure that advice to a Client about support options (including those not delivered directly by CDNI Care is transparent, promotes choice and control and is made available to the Client in the language, mode of communication and using terms which the Client is most likely to understand.
- (d) All Clients will be treated equally, and no Client will be given preferential treatment above another in the receipt or provision of supports.

#### 3.2 Managing Conflict of Interest

- (a) Clients will be presented with a range of choices about providers of support. CDNI Care will not seek to influence the Client to select itself or any other provider of support.
- (b) As CDNI Care provides support coordination as well as other supports to Clients, Clients are always informed of other alternative providers available to provide necessary support, enabling Clients and families to exercise their choice and control in the support received. Clients and families are also informed of any perceived or actual conflicts with other providers who may have a relationship with CDNI Care, where this is relevant.

#### 3.3 Feedback and Complaints Management Policy

If a dispute arises between CDNI Care and the Client or the Client has a complaint in relation to support coordination services provided by CDNI Care to the Client or CDNI Care's management of any perceived or

Approved By:	The board of CDNI Care Pty Ltd	Version	1
Approval Date:	August 2020	Next Scheduled Review	August 2022

actual conflict of interest, the dispute or complaint will be dealt with in accordance with CDNI Care's complaint handling policy.

#### 4. Procedure

This Policy is supported by the following Procedures. The Procedures work together dynamically and are relevant to all parts of CDNI Care. The Procedures are not ordered in priority and all are important to achieving the aims of this Policy.

Procedure	Responsibility
<p><b>4.1 Managing Conflict of Interest</b></p> <p>Where conducting support coordination services to a Client, ensure that any perceived or actual conflict of interest is managed in the following way:</p> <ul style="list-style-type: none"> <li>(a) explain this Policy to the Client in the language, mode of communication and using terms which the Client is most likely to understand;</li> <li>(b) ensure there is no conflict of interest, when support coordinators obtain quotes for services on THE Client's behalf, endeavour to always provide 3 quotes (if possible) from other services, in addition to CDNI Care's own quote. It is then the Client's decision if they would like to choose CDNI Care's services and support or go with another provider.</li> <li>(c) make clear to the Client that their decision to choose an alternative provider will not affect their support coordination services at all, as they operate independently from each other, and that the Client need not be worried about any repercussion;</li> <li>(d) document, in case notes, the choice of providers offered to the Client and/or their nominee for each support category where a provider is to be engaged;</li> <li>(e) document, in case notes, the rationale for the Client's choice of provider for each support category where a provider is engaged;</li> <li>(f) where the Client has chosen another provider for any of the services, a request for capacity or quote is documented by the support coordinator;</li> <li>(g) provide information to the Client and/or their nominee at the initial meeting of the process for requesting a change in service provider, including support coordination.</li> </ul>	<p><b>All Workers</b></p>
<p><b>4.2 Complaints and disputes</b></p> <ul style="list-style-type: none"> <li>(a) Respond to and deal with any other complaints or disputes in accordance with CDNI Care's Policy for dealing with complaints and disputes.</li> </ul>	<p><b>All Workers</b></p>
<p><b>4.3 Workers to commit to Policy</b></p>	<p><b>All Workers</b></p>

Approved By:	The board of CDNI Care Pty Ltd	Version	1
Approval Date:	August 2020	Next Scheduled Review	August 2022

<p>(a) All Workers are provided with a copy of this Policy in their orientation and induction materials.</p> <p>(b) Under their employment, contractor agreement or binding letter agreement, each Worker at CDNI Care is required to take responsibility for ensuring:</p> <p>(1) full understanding of the commitments outlined in this Policy as well as procedures and other strategies designed to ensure that the principles of this Policy are upheld; and</p> <p>(2) ensuring that the principles and procedures and other strategies within this Policy are applied in their daily work.</p>	
<p><b>4.4 Train Workers</b></p> <p>(a) Training and supporting Workers to ensure that the Procedures are followed.</p> <p>(b) Training staff to recognise the importance of following the Procedures.</p>	<p><b>Principal and Key Management Personnel</b></p>
<p><b>1.2 Complementary policy adoption</b></p> <p>Adopt and maintain the Policy and Related Documentation which assists CDNI Care to demonstrate the relevant NDIS Quality Indicator related to the Conflict of Interest NDIS Practice Standard.</p>	<p><b>Principal and Key Management Personnel</b></p>

## 5. Procedure

### 5.1 Relevant Legislation, Regulations, Rules and Guidelines

Legislation, Rules, Guidelines and Policies applies to this Policy and Related Documentation as set out in the Legislation Register.

### 5.2 Inconsistency

If and to the extent that the terms of this Policy are or would be inconsistent with the requirements of any applicable law, this Policy is deemed to be amended but only to the extent required to comply with the applicable law.

### 5.3 Policy Details

**Approved By:** The board of CDNI Care Pty Ltd

**Approval Date:** August 2020

**Next Scheduled Review:** August 2022

**Version:** 1

<b>Approved By:</b>	The board of CDNI Care Pty Ltd	<b>Version</b>	1
<b>Approval Date:</b>	August 2020	<b>Next Scheduled Review</b>	August 2022