

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 Ellie Jane Support Service to apply the Governance and Operational Management NDIS Practice Standard.

1.2 Policy Aims

Ellie Jane Support Service is committed to ensuring each participant's support is overseen by robust governance and operational management systems relevant (proportionate) to the size, and scale of the provider and the scope and complexity of supports delivered.

1.3 NDIS Quality Indicators

In this regard, Ellie Jane Support Service 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) Opportunities are provided by the governing body for people with disability to contribute to the governance of the organisation and have input into the development of organisational policy and processes relevant to the provision of supports and the protection of participant rights.
- (b) A defined structure is implemented by the governing body to meet a governing body's financial, legislative, regulatory and contractual responsibilities, and to monitor and respond to quality and safeguarding matters associated with delivering supports to participants.
- (c) The skills and knowledge required for the governing body to govern effectively are identified, and relevant training is undertaken by members of the governing body to address any gaps.
- (d) The governing body ensures that strategic and business planning considers legislative requirements, organisational risks, other requirements related to operating under the NDIS (for example Agency requirements and guidance), participants' and workers' needs and the wider organisational environment.
- (e) The performance of management, including responses to individual issues, is monitored by the governing body to drive continuous improvement in management practices.
- (f) The provider is managed by a suitably qualified and/or experienced persons with clearly defined responsibility, authority and accountability for the provision of supports.
- (g) There is a documented system of delegated responsibility and authority to another suitable person in the absence of a usual position holder in place.
- (h) Perceived and actual conflicts of interest are proactively managed and documented, including through development and maintenance of organisational policies.

1.4 Scope

- (a) This Policy applies to the provision of all services and supports at Ellie Jane Support Service.

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- (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 Ellie Jane Support Service 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:

Ellie Jane Support Service means Ellie Jane Support Service Pty Ltd ABN 38 660 552 965.

Client means a client of Ellie Jane Support Service (including an NDIS participant).

Legislation Register means the register of legislation, regulations, rules and guidelines maintained by Ellie Jane Support Service.

Policy Register means the register of policies of Ellie Jane Support Service.

Principal means Ellie Ludlow.

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 Ellie Jane Support Service and includes the Principal.

3. Policy Statement

3.1 General

- (a) Ellie Jane Support Service and its Workers will ensure that when providing supports 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 its 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 a person with a disability and/or their family so as to limit that person's access to information, opportunities, and choice and control.
- (c) Workers will ensure that Ellie Jane Support Service 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 Ellie Jane Support Service) is transparent and promotes choice and control.

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- (d) All Clients will be treated equally, and no Client shall be given preferential treatment above another in the receipt or provision of supports.

3.2 Managing conflicts of interest with respect to Workers

- (a) Upon commencing work at Ellie Jane Support Service, all Workers are required to disclose to Ellie Jane Support Service in writing any and all matters, interests or conflicts that have the potential to impact on how they deliver, or how they may be perceived to deliver, support and services to a Client (including an NDIS participant). This includes matters or interests of a financial, business or personal nature, including any financial and/or corporate interest or relationship they may have with other entities, including businesses and organisations.
- (b) If they develop any matter, interest or conflict that has the potential to impact on how they deliver, or how they may be perceived to deliver, support and services to a Client (including an NDIS participant), they are required to immediately disclose it to Ellie Jane Support Service in writing.

3.3 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.

3.4 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.

3.5 Policy Details

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