

Conflicts of Interest Policy

Interchange Outer East (IOE) is approved as a registered provider of plan management, support coordination, and a wide range of other supports under the National Disability Insurance Scheme (NDIS). IOE acknowledges the inherent risk of actual or perceived conflicts of interest in delivering multiple services to a participant.

This document provides a framework for identifying, disclosing, and resolving situations where conflicts of interest exist or may be perceived to exist. It reflects current best practice and aligns with the NDIA 2025-26 guidelines regarding conflict of interest management for registered providers.

This policy covers all divisions of IOE and applies to all employees and volunteers, appointed representatives and any persons directly or indirectly linked to IOE (family, friends, or employees and volunteers of other organisations), regardless of location.

Conflicts of Interest Identification

A conflict of interest arises when an individual or organisation (including IOE) has personal, financial, or other interests that may affect their ability to act impartially and in the best interests of the participant.

Types of conflict include:

- **Actual:** A direct conflict currently exists
- **Potential:** A conflict may arise in the future
- **Perceived:** A reasonable person might believe a conflict exists

Examples include:

- Making decisions for personal or financial gain
- Prioritising one participant or group of participants over another
- Recommending IOE services without providing impartial advice
- Favouring family or friends in decisions
- Acceptance of gifts or incentives from participants or other stakeholders
- Making decisions that result in a benefit to IOE at the expense of participant choice or control
- Creating an appearance of improper conduct that could affect confidence in, or the reputation of, IOE

NDIA Compliance and Transparency Requirements

To comply with updated NDIA directions, IOE has taken the following steps:

- IOE clearly separates roles across plan management, support coordination, and direct supports through dedicated teams, distinct reporting lines, and separate supervision structures. Staff working in these areas are not involved in the delivery or oversight of other IOE services to the same participant.
- IOE prohibits staff from receiving incentives (financial or otherwise) related to referrals or participant decisions to use IOE services.
- Staff performance is not linked to participant uptake.

- IOE ensures that participant communication consistently promotes informed choice and control. All service information includes a clear explanation that participants can choose any provider and that IOE offers only one of many available options.
- IOE maintains a Conflicts of Interest Register, which is actively updated as issues arise and formally reviewed every quarter by the leadership team.
- IOE will not claim NDIA funds if a conflict is identified and has not been properly disclosed or managed.
- IOE will not claim NDIA funds where a conflict is unresolved or has not been transparently declared.

Policy Commitments and Participant Rights

To ensure transparency from the outset, a copy of this Conflicts of Interest Policy is sent to all participants along with their service agreement. Acknowledgement of this policy is requested not only at the time of initial engagement, but also whenever a new service agreement is issued, for example, due to price changes or the addition of new services.

1. IOE ensures administrative, operational, and service-level separation between plan management, support coordination, and other supports.
2. IOE staff will act in the best interests of participants to ensure they are informed, empowered and able to maximise choice and control.
3. IOE staff must:
 - Inform participants of their right to choose any provider for any service
 - Provide lists of alternative providers upon request
 - Avoid suggesting that participants must use IOE services
 - Refrain from offering or accepting gifts that could influence decisions
4. IOE will:
 - Offer services irrespective of how the participant's plan is managed
 - Where it is obvious that IOE is unable to meet a participant's need, IOE will provide information on other services that may be more suitable and encourage and support them to engage in services outside of IOE.
 - Share this policy at the commencement of service
 - Notify participants of any conflicts affecting their services
5. Participants are encouraged to use the grievance procedure or feedback form if they suspect any bias or improper conduct.

Conflict Management Procedures

All conflicts must be managed through a consistent process:

1. **Disclosure:** Employees and volunteers must disclose any potential conflict to their Team Leader.
2. **Assessment:** Team Leader assess and document the conflict, its nature, and risks.
3. **Action:** Mitigation steps may include:
 - Reassignment of duties
 - Withdrawal from affected processes
 - Participant consultation
 - Implementing oversight or independent review
 - In some cases, no specific action may be required beyond declaration of the conflict and acknowledgement by relevant parties
4. **Documentation:** All conflicts and outcomes are recorded in the Conflict of Interest Register. Regardless of the mitigation steps taken, all identified or perceived conflicts must be entered into the register by the relevant team leader and reviewed by the General Manager as part of the organisation's oversight and governance process.

Staff Involvement in External Activities

IOE encourages and supports staff members becoming involved in community activities and volunteer work in their personal lives. However, it is possible that staff members may undertake volunteer or professional roles outside the organisation that give rise to a conflict of interest, or a perception of conflict (e.g. staff undertaking consultancy work for member organisations or government agencies).

Staff must declare any external employment or volunteer activity that may overlap with their role at IOE. Declarations must be reviewed upon commencement and whenever circumstances change.

Training and Oversight

- The Conflicts of Interest Policy is covered during staff induction.
- The policy is always accessible to staff via staff manual, Employment Hero and the IOE website.
- Team Leaders are responsible for ensuring staff understand and follow conflicts of interest procedures.

Breaches

Failure to comply with this policy may result in disciplinary action, up to and including termination of employment. NDIA will be notified of serious breaches in accordance with reporting requirements.