



**In Step
Supports**

Conflict of Interest Policy and Procedure

Document Title	Conflict of Interest Policy & Procedure
Related Standards	NDIS Practice Standards – Provider Governance and Operational Management

Conflict of Interest Policy and Procedure

1.0 Purpose

The purpose of this policy is to ensure that all actions and decisions at In Step Supports Pty Ltd are objective, fair, and fully informed, in alignment with our corporate and ethical standards. Conflicts of interest, whether actual, potential, or perceived, may influence an individual's actions, choices, or decisions, and can compromise the integrity of service delivery.

At In Step Supports Pty Ltd, we proactively manage both actual and perceived conflicts of interest by developing and maintaining robust organisational policies. This management ensures that our corporate values and ethical principles do not compromise participants' right to choice and control over their support and services.

We recognise that conflicts of interest may arise in the delivery of services, regardless of their scope or complexity. This policy outlines the measures we take to prevent and address any conflicts, ensuring compliance with the NDIS Code of Conduct and maintaining the trust and well-being of our participants.

2.0 Scope

This policy applies to all staff, management, key personnel, contractors, consultants, Board members, and volunteers of In Step Supports Pty Ltd.

3.0 Policy

In Step Supports Pty Ltd is committed to ensuring that all decisions and actions are made impartially, ethically, and in the best interests of our participants, upholding their choice, control, and rights at all times. To achieve this, In Step Supports Pty Ltd takes a proactive approach to identifying, disclosing, and managing conflicts of interest in line with the NDIS Practice Standards and Quality Indicators.

The Director is responsible for overseeing the declaration and management of conflicts of interest as part of their legal obligations as the controlling member of the organisation. Conflicts of interest must be managed in a way that prevents any undue influence over decisions that could compromise participant rights or outcomes.

This policy requires management and staff to disclose any outside interests or affiliations that may conflict with the organisation's interests. The Director must act impartially, without bias or prejudice, and ensure that no gifts or benefits are accepted that could influence any decision related to In Step Supports Pty Ltd's operations.

Examples of conflicts of interest may include, but are not limited to:

- Close personal relationships (e.g., family or friends) that influence decisions related to employment, discipline, service allocation, or contract awards
- Individuals or their close associates (family or friends) who stand to gain financially or in other ways due to a decision or action taken within In Step Supports Pty Ltd
- Engagement with an organisation that provides services in direct competition with In Step Supports Pty Ltd, where access to sensitive commercial or financial information could compromise objectivity
- Pre-existing agreements or allegiances that require an individual to act in the interests of another party, potentially conflicting with the best interests of In Step Supports Pty Ltd or its participants

All staff, management, and contractors are required to adhere to the NDIS Code of Conduct, which mandates the identification, declaration, and management of conflicts of interest to ensure that participant choice and control are never compromised.

In instances where the organisation provides services that may present a risk of conflict, we will proactively identify, declare, and manage any potential conflicts of interest. We will provide participants with clear, transparent information about all available service options and ensure that participant choice is respected, without any undue influence.

To ensure that conflicts of interest are appropriately managed, In Step Supports Pty Ltd will provide regular training to all staff and management on how to identify, declare, and manage conflicts of interest in line with this policy and NDIS requirements.

Where a conflict of interest is identified that may impact a participant's ability to exercise choice and control, In Step Supports Pty Ltd will:

- Fully inform the participant of the conflict of interest
- Provide transparent advice about all available service options, including external providers
- Ensure the participant is supported to make an independent decision, free from coercion or influence

4.0 Procedure

4.1 Registration of known conflicts of interest

The Conflict of Interest Register will be maintained in a secure and confidential manner, accessible only to authorised personnel, and will be reviewed regularly to ensure that all conflicts are actively monitored and appropriately managed.

- potential or actual conflicts of interest that exist when a person joins the organisation

- conflicts of interest during their involvement with the organisation are recorded in the register maintained by the Director or their delegate

The Conflict of Interest Register will be audited annually as part of our governance review. All board and management meetings will include a standing agenda item for the disclosure of any conflicts of interest.

All workers and key personnel involved in service delivery or decision-making will maintain current NDIS Worker Screening clearance to ensure their suitability to work with participants, and must comply with conflict of interest requirements under this policy

All potential and actual conflicts will be recorded in the register to show the identified and declared conflicts.

All management and staff must declare any potential or actual conflicts of interest that become evident during their involvement with the organisation. Management must disclose potential conflicts before the commencement of any meeting.

All management and staff must speak with the Director when a conflict becomes apparent and provide formal notification in writing to the Director of the conflict.

4.2 Management of conflicts of interest

Where a conflict of interest is declared or identified by a staff member:

- the immediate supervisor and the Director will assess the conflict
- if a conflict of interest exists (or there is a perception that a conflict exists), the staff member may be asked to:
 - contribute to the discussion but abstain from voting or taking part in a decision on the matter
 - observe but not take part in the discussion or decision-making
 - leave the meeting during the discussion and before a decision has been made

Participants will be informed where a conflict of interest is identified that may impact their services or choice of providers, and will be given options to choose alternative supports if they prefer.

Participants will be notified in writing when a conflict of interest arises that may affect their service. They will be provided with independent options and support to make an informed decision. Serious or unresolved conflicts must be escalated to senior management or the Board for resolution and documented action.

4.2.1 External Reporting Options

If a conflict of interest cannot be resolved internally, or if a person feels that the conflict is not being managed fairly or transparently, they have the right to escalate their concerns to external bodies. This may include:

- NDIS Commission: for concerns about provider conduct or conflict of interest management impacting participant rights, choice, and control. Contact via [NDIS Commission website](#) or 1800 035 544
- Independent advocates or advocacy organisations: for support in raising concerns about conflicts of interest
- Whistleblower mechanisms, if applicable, for anonymous reporting of serious conflicts of interest involving misconduct, fraud, or ethical breaches

Participants and staff will be informed of these external options if a conflict of interest remains unresolved or if they prefer to seek external review at any stage.

4.3 Staff involvement in external activities

In Step Supports Pty Ltd encourages and supports staff to become involved in community activities and volunteer work in their personal lives. However, the staff member may undertake volunteer or professional roles outside the organisation, leading to a conflict of interest or a perception of conflict, e.g., consultancy work for member organisations or government agencies.

As a result, In Step Supports Pty Ltd expects that all staff members declare their involvement in external work-related activities to allow for discussion and management of the potential conflicts of interest with the Director. Staff members undertaking other (new) work outside the organisation must inform the Director.

4.4 Contractors

All contracts with external consultants engaged by the organisation will include a Conflict of Interest Declaration confirming that no conflict of interest exists.

5.0 Related documents

- Code of Conduct Agreement
- Conflict of Interest Declaration
- Conflict of Interest Register
- Privacy and Confidentiality Agreement
- Support Coordination Conflict of Interest Declaration

6.0 References

- NDIS Conflict of Interest Guidance
- NDIS Act 2013 (Commonwealth)

- NDIS Practice Standards and Quality Indicators 2021 (including updated guidance)
- NDIS Code of Conduct (2018) and Explanatory Guidelines (updated 2022–2023)
- Privacy Act 1988 (Commonwealth)
- Australian Privacy Principles (Commonwealth)
- NDIS Worker Screening Rules 20

