

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 Cornerstone Connections to apply the Governance and Operational Management NDIS Practice Standard.

1.2 Policy Aims

Cornerstone Connections 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, Cornerstone Connections 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 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.

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1.4 Scope

- (a) This Policy applies to the provision of all services and supports at Cornerstone Connections.
- (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 Cornerstone Connections 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:

Cornerstone Connections means Cornerstone Connections Pty Ltd ABN 36 672 788 028.

Participant means a Participant of Cornerstone Connections.

Legislation Register means the register of legislation, regulations, rules and guidelines maintained by Cornerstone Connections.

Policy Register means the register of policies of Cornerstone Connections.

Principal means Suzan Delavere.

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 Cornerstone Connections and includes the Principal.

3. Policy Statement

3.1 General

- (a) Cornerstone Connections and its Workers will ensure that when providing supports to Participants under the NDIS, any conflict of interest is declared and any risks to Participants are mitigated.
- (b) All Workers will act in the best interests of its Participants, 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 Cornerstone Connections 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

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- (2) ensure that advice to a Participant about support options (including those not delivered directly by Cornerstone Connections) is transparent and promotes choice and control.
- (d) All Participants will be treated equally, and no Participant 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 Cornerstone Connections, all Workers are required to disclose to Cornerstone Connections 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 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 Participant, they are required to immediately disclose it to Cornerstone Connections in writing.

3.3 Managing conflict of interest in Support Coordination

- (a) Participants will be presented with a range of choices about providers of supports. Cornerstone Connections will not seek to influence the Participant to select itself.
- (b) As Cornerstone Connections provides support coordination as well as other supports to Participants, Participants are always informed of other alternative providers available to provide necessary supports, enabling Participants and families to exercise their choice and control in the supports received. Participants and families are also informed of any relevant conflicts with other providers who may have a relationship with Cornerstone Connections, where this is relevant.
- (c) Specifically and where conducting support coordination services to a Participant, to ensure that any perceived or actual conflict of interest is managed, Cornerstone Connections will:
 - (1) explain this Policy to Participants in a manner that the Participant is most likely to understand.
 - (2) to ensure there is no conflict of interest, when our support coordinators obtain quotes for services on a Participant's behalf, endeavour to always provide 3 quotes (if possible) from other services, in addition to our own. It is then the Participant's decision if they would like to choose our services and supports or go with another provider.
 - (3) make clear to the Participant 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 Participant need to be worried about any repercussion.
 - (4) document, in case notes, the choice of providers offered to a Participant and/or their nominee for each support category where a provider is to be engaged.
 - (5) document, in case notes, the rationale for the Participant's choice of provider for each support category where a provider is engaged.
 - (6) where a Participant has chosen another Cornerstone Connections service for service provision, a request for capacity or quote is documented by the support coordinator.

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- (7) provide information to the Participant and/or their nominee at the initial meeting of the process for requesting a change in service provider, including support coordination.

3.4 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.

3.5 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.

3.6 Policy Details

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