



# Conflict of Interest Policy

## Overview

This policy helps to identify, disclose, and manage any actual, potential or perceived conflicts of interest. All representatives must be aware of their obligations to disclose any conflicts of interest that may exist. All representatives of the organisation must comply with this policy to ensure conflicts of interests are effectively managed.

### What is a Conflict of Interest?

A conflict of interest occurs when someone has real or perceived competing private and professional interests. These interests may make it difficult to fulfil their professional duties without bias or the perception of bias. Personal interests include those of family, friends, or other organisations a person may be involved with (for example, as a shareholder, board member or business owner). A conflict of interest may be actual, potential, or perceived and may be financial or non-financial.

Conflicts of interest may include, but are not limited to:

- Financial Interests: Personal financial stakes in decisions affecting the organisation, such as in suppliers or service providers.
- Personal Relationships: Relationships with family, friends, or acquaintances that could influence decisions related to the allocation of support services, employment, or contracts within the organisation.
- Employment Decisions: Influence over hiring, promotion, or other employment-related decisions where the individual has a personal interest, including decisions about roles that impact NDIS participants or disability support services.
- Acceptance of Gifts: Receiving gifts, services, or benefits from individuals or organisation with a vested interest in decisions related to disability support services, funding, or service provision.
- Confidential Information: Misuse of confidential information about participants, staff, or organisational operations for personal gain or to benefit a third party.
- Misuse of Resources: Using the organisation's facilities, equipment, or resources for personal benefit or for activities that conflict with the organisation's mission or services provided to NDIS participants.

These situations present the risk that decisions are affected by these influences, rather than in the best interests of the participant and must be managed accordingly.

### What is NOT a Conflict of Interest?

Situations that do not qualify as a conflict of interest are memberships or affiliations with other organisations where there is no possible benefit or perception of benefit (including unions), or approved collaborations with other organisations.



# CONFLICT OF INTEREST POLICY

Every Human Disability Services Pty Ltd

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## Our Commitment

Every Human Disability Services is firmly committed to upholding the highest standards of integrity and transparency in all our operations. We recognise that conflicts of interest can undermine the trust placed in us by participants, stakeholders, and the broader community. Therefore, we are dedicated to proactively identifying, disclosing, and managing any actual, potential, or perceived conflicts of interest that may arise. Our commitment extends to ensuring that all representatives are well-informed and adhere to our Conflict of Interest Policy by fostering a culture of openness and accountability. We aim to safeguard the impartiality of our decision-making processes and ensure that the interests of those we support remain paramount.

## Staff Responsibilities

### All Staff Responsibilities:

- Avoid conflicts of interest where possible. Refrain from engaging in activities or relationships that could improperly influence or appear to influence your professional responsibilities or decisions.
- Identify and disclose any potential conflicts of interest promptly. Ensure that such conflicts are carefully managed and reported to management in accordance with established procedures.
- Seek guidance from management if you are unsure whether a situation constitutes a conflict of interest or how to best manage it.
- Promptly report any breaches or concerns related to the policy. Cooperate in responding to and resolving such issues.

### Key Management Personnel Responsibilities:

- Collaborate with all staff members to identify, avoid, or manage any potential conflicts of interest.
- Maintain clear procedures for staff to disclose potential conflicts of interest, including how and when they should report them.
- Ensure that all reported conflicts of interest are accurately recorded in the Conflict of Interest Register.
- Periodically review the Conflict of Interest Register to assess and address any recurring or systemic issues.

### Gifts & Benefits

Representatives are prohibited from accepting money, gifts, services, or other benefits that could influence their actions in a manner contrary to the best interests of a participant. It is essential that representatives do not hold any financial or personal interests that could affect or compromise the choice of provider or the provision of support to participants. This prohibition extends to accepting or offering any form of commission.

## Relevant Items

Regulations relevant to this policy include:

- *NDIS (Code of Conduct) Rules 2018*

Internal Documents relevant to this policy include:

- Conflict of Interest Register