

Conflict of Interest Policy

Policy area	Risk Management
Document type	Policy
Applicable to	Compass Care Group Pty Ltd
Version	2.1
Date approved	22/02/2026
Approved by	Community Services Manager
Next review date	22/02/2027
Related policies	Risk Management Policy Safeguarding Against Violence, Abuse, Neglect, Exploitation and Discrimination Policy Duty of Care Policy Human Resources Management Policy Consent Policy Client Advocacy Policy Incident Management Policy Support Planning Policy Service Access and Exit Policy Service Delivery Policy Client Feedback and Complaints Management Policy Client Money and Property Policy Information Management Policy Privacy Policy
Authority	NDIS Act 2013 NDIS Practice Standards and Quality Indicators NDIS Code of Conduct Aged Care Act 1997 Aged Care Quality and Safety Standards Aged Care Code of Conduct

PURPOSE

The purpose of this policy is to explain our organisation’s commitment and approach to managing conflicts of interest.

SCOPE

This policy applies to all our workers (employees, contractors and volunteers).

DEFINITIONS

Term	Definition
Conflict of Interest	There is a conflict of interest when an individual (or organisation) is in a position to take advantage of their professional or official capacity for personal (or organisational) benefit (in addition to charging fees for services in the usual course of business). A conflict of interest may be: <ul style="list-style-type: none"> ● actual, potential or perceived; ● direct or indirect; ● financial or personal.

CONTEXT

Our organisation recognises that declaring or avoiding conflicts of interest is an important part of:

- safeguarding the client against exploitation and/or discrimination;
- ensuring that the client has access to services and supports that best suit their individual needs, circumstances, preferences and goals;
- upholding the client's right to informed choice, control and self-determination; and
- maintaining integrity of the service provided, by removing any form of bias, favouritism or discrimination.

POLICY STATEMENT

1. Fair, Transparent and Objective Actions and Decisions

- We will act in the best interests of the client at all times.
- We will ensure service access and delivery actions and decisions are unbiased, fair, objective and ethical.
- We will maintain processes to enable open and transparent disclosure of conflicts of interest.

2. Gifts, Benefits and Commissions

- We will not accept, receive or encourage offers of money, gifts, services or other benefits from clients.
- If money, gifts, services or other benefits are received from clients, we will document this in the Conflict of Interest Register.
- We will not offer gifts, services or other benefits to clients that may be perceived to show bias, preferential treatment or coercion.

3. Risk Management

- We will maintain processes for all workers to declare any conflict of interest on onboarding with our organisation and during their involvement with our organisation.
- If a conflict of interest is declared, we will:
 - identify the stakeholders affected and let them know of the declared conflict of interest;
 - assess the seriousness of the situation — taking into account factors such as duty of care, privacy and risks;
 - ensure the person with the conflict of interest does not take part in discussion or decision-making while the case is being managed; and

- conduct any required internal and external reporting in the required timeframe and format.

4. Information and Record-keeping

- We will ensure information and records are accurate and up to date.
- We will ensure the client has provided us with all required written consents.
- We will store the information securely to ensure privacy, dignity and confidentiality and make sure it is accessible to the client and only other stakeholders authorised to access it.

5. Worker Training and Supervision

- We will maintain a skilled and trained workforce which is aware of their responsibilities in relation to preventing or declaring a conflict of interest.
- We will maintain processes to adequately monitor and supervise workers.

SUPPORTING DOCUMENTS

Related procedures and forms include:

- Privacy and Confidentiality Agreement
- Support Coordination – Conflict of Interest Declaration - Participant
- Third-Party Information Release Consent form
- Conflict of Interest Register
- Conflict of Interest Declaration form
- Risk Management Procedure
- Incident Management Procedure
- Reportable Incident Management Procedure
- Client Money and Property Procedure
- Client Advocacy Procedure
- Safeguarding Against Violence, Abuse, Neglect, Exploitation and Discrimination Procedure
- Client Feedback and Complaints Management Procedure
- Delegation of Authority Procedure

RESPONSIBILITIES

Community Services Manager is responsible for:

- maintaining this policy, its related procedures and associated documents;
- ensuring the policy is effectively implemented across the service;
- monitoring workers compliance with the requirements of this policy; and

- ensuring training and information is provided to workers to carry out this policy.

All workers are responsible for complying with the requirements of this policy.

COMPLIANCE

Deliberate breaches of this policy will be dealt with under our misconduct provisions, as stated in the Code of Conduct Agreement.