



Conflict of Interest Policy and Procedure



Purpose and Scope

Network Rehabilitation Group (NRG) is committed to proactively identifying, managing, and where possible, avoiding real, perceived, or potential conflicts of interest in the delivery of Rehabilitation Support Services (RSS) and Network Case Management Services (NCMS).

Effective conflict of interest management is a core component of NRG's Risk Management Framework. It reflects our obligation as an NDIS provider to act in accordance with the National Disability Insurance Scheme (Code of Conduct) Rules, which sets clear expectations for respectful, safe, and rights-based support. This approach also upholds NRG's commitment to integrity, honesty, and transparency in all aspects of service delivery.

This policy and procedure applies to all employees, contractors, reference group members, participants and family members who engage with Rehabilitation Support Services and Network Case Management Services.

2.0 Definitions

Conflict of Interest: 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.

Real: Where a direct conflict exists between current official duties and existing private interests.

Perceived: Where it appears or could be perceived that private interests are improperly influencing the performance of official duties whether or not that is actually the case.

Potential: Where private interests are not but could come into direct conflict with official duties.

Support Worker: A person employed to provide supports to our participants so they may achieve their goals.

Participant: Refers to a person who accesses supports from either Network Case Management Services or Rehabilitation Support Services or both.

Family member: Refers to people who may or may not be directly related to the participant but who the participant identifies as having a significant familial affect in the participants life.

Key supporter: Refers to friends, partners or others who have experience in providing ongoing care and support to our participants.

Reference group member: A person that is a member of NRG's Consumer Reference Group.

Employees: A person that has an employment contract with NRG whether it be casual, part-time, full-time or contract.

Omission: Withholding information.

3.0 Policy

Conflicts of interest occur in all businesses. What is important is that we are aware of them, we declare them, and we find a way to mitigate any risk so we can provide our Participants with the choice, control and high quality supports they deserve. All employees will act in the best interests of Participants by ensuring compliance with NDIS standards, legislation and, ensuring that Participants are informed, empowered and able to maximise choice and control. Employees 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. As required by the NDIS Terms of Business, all participants will be treated equally, and no participant shall be given preferential treatment above another in the receipt or provision of supports.

NRG employees will ensure they proactively manage, real, perceived or potential conflicts of interest in service delivery. As part of our commitment to ethical delivery of services all Network Rehabilitation Group employees, participants and contractors will:

- Act in accordance with our purpose and vision
- Avoid conflict of interest where possible
- Identify and disclose any conflicts of interest
- Comply with this policy and procedure
- Actively manage any conflicts of interest

Network Case Management Services: Support Coordinators and Specialist Support Coordinators need to be particularly aware of real, perceived, or potential conflicts of interest as their role is to support people to make choices about what is best for them to achieve their NDIS goals. As NRG offers both support coordination through NCMS and core supports through RSS we need to ensure we always remain transparent about this conflict.

Examples of conflict of interest include:

- An NCMS coordinator recommends RSS core supports without disclosing the business connection and without providing other core support providers.
- An NCMS or RSS employee does not disclose that a potential employee is a friend or family member of theirs.
- An RSS employee establishes their own part-time support work business and offers and/or begins to provide support services to a participant they already support through their RSS role.
- An NCMS or RSS employee accepts gifts or treats from a Participant or their family of more than a minor value.
- An employee accepts money from a Participant as a 'thank you' for wonderful support.
- If an employee is a friend or a family member of a Participant, they might treat that person differently to the other people they support. For example, they might give the person extra support that they do not have to pay for because they are a friend.
- An employee supports a Participant as both an NCMS and RSS employee.

- NRG does not disclose to Participants that we provide Support Coordination and Case Management through NCMS and Core Supports through RSS.

4.0 Procedure

Conflict of interest is not the act of doing something wrong. It is just a state of being that arises when employees are not completely independent from NRG, our participants, or other organisations. However, with the right systems and processes in place, the risk that a conflict of interest will negatively impact on NRG or disadvantage a Participant can be mitigated.

Network Rehabilitation Group takes the following steps to manage conflict of interest:

- We have different websites for NCMS and RSS, creating service separation.
- We declare our different service offerings in our Participant Welcome Pack.
- We maintain a **Conflict of Interest Declaration and Register**.
- We ensure all employees understand and abide by the **NDIS Code of Conduct - Guidance for Workers**; and NRG abides by **NDIS Code of Conduct - Guidance for NDIS Providers**. We
 - Provide mandatory **Professional Boundaries training** and **Managing Conflict of Interest training** via the eTrainu online module, face to face at induction and mandatory training refresher sessions.
 - RSS employees receive a hard copy the **RSS Support Worker Handbook** which is also available electronically via the Support Worker Application ***When I Work***; providing clear and practical guidance to help workers understand and apply the National Disability Insurance Scheme (Code of Conduct) Rules 2018 in everyday practice; including specific reference to
- NCMS and RSS have separate service agreements to ensure participants and their families are aware that if they choose to use both services, they can cease either of them at any time and it won't affect their other support.
- We ensure our Coordinators are linking participants in with multiple providers that meet the NDIS requirements of choice and control and that we evidence this within our client files and Lumary.
- We provide our employees with supervision to ensure accountability

Registering a conflict of interest

Potential employees: must declare any family connections to other NRG employees or participants as well as other employment they may have to their recruiting Manager, in writing via email.

The RSS and NCMS Manager will discuss the conflict with the Business Manager who will add it onto the Conflict of Interest Register if the candidate becomes an employee.

Current employees: All NRG employees must maintain integrity by declaring any real or perceived conflicts of interest to their line Manager, in writing via email. Their line Manager will discuss the conflict with the Business Manager who will add it onto the Conflict of Interest Register.

If an NRG employee is offered a gift, treat or money from a participant, their family, or another organisation this must be reported to their line manager, in writing via email. The manager will assess the situation and provide the employee with guidance on professional boundaries and conflict of interest if required.

If an NRG employee feels that their beliefs or values may impact on their ability to deliver high quality supports to the participant this must be reported to their line manager, in writing via email. The manager will discuss the situation with the employee and a mutually agreeable solution will be reached.

All new conflicts added onto the Conflict of Interest Register will be discussed monthly during NRG's Safety & Quality Committee meeting.

Failure to register a conflict of interest will result in disciplinary action and may result in dismissal.

5.0 Related internal documents

Risk Management Framework
Code of Conduct
Employee Handbooks

Conflict of Interest Register
Participant Welcome Pack
Employee Inductions

6.0 Supporting legislation and standards

NDIS Code of Conduct, Guidance for NDIS Providers
NDIS Code of Conduct, Guidance for Workers
NDIS Terms of Business March
NDIS Code of Conduct Rules
NDIS (Provider Registration and Practice Standards) Rules
NDIS Act
The Charter of Human Rights and Responsibilities Act
Privacy Act 1988 (Commonwealth)
Australian Privacy Principles (APP)
Privacy and Personal Information Protection Act
Disability Services Act (National Standards for Disability Services) Determination
Corporations Act

Authorised

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