

Conflict of Interest Policy

1. What is a conflict of interest?

A conflict of interest occurs when the private interests of an officer or employee of RenaissCare interfere, or appear to interfere, with the performance of their official duties. Such a conflict can arise from avoiding personal losses as well as gaining personal advantage – whether financial or otherwise.

While conflicts of interest should be avoided wherever possible, conflicts often happen without anybody being at fault. Conflicts of interest can, if not identified, disclosed and managed effectively create a catalyst for misconduct. Conflicts of interest cannot always be avoided or prohibited and as such unavoidable conflicts of interest need to be disclosed, identified and effectively managed.

2. Types of conflict of interest

Private Interests

An interest in this context means anything that can have an impact on an individual or group. The term includes not only the personal, professional or business interests that each of us have but also personal, professional or business interests of the individuals or groups we associate with. This might include relatives, friends or even rivals and enemies.

Pecuniary Interests

Also known as material personal interest and involves an actual or potential financial gain or loss. Money does not need to change hands for an interest to be pecuniary. People have a pecuniary interest if they receive concessions, discounts, gifts or hospitality from a particular source.

Non-Pecuniary Interests

Do not have a financial component. They may arise from personal or family relationships, or involvement in sporting or social or cultural activities. They include any tendency towards favour or prejudice resulting from friendship, animosity, or other personal involvement with another group or person.

3. Managing conflicts of interest generally

The NDIS Terms of Business for Registered Providers require providers to have policies about potential conflicts of interest in service delivery.

RenaissCare and its team members will ensure that when providing supports to customers under the NDIS, including when offering plan management or support coordination services, any conflict of interest is declared and any risks to customers are mitigated.

All employees will act in the best interests of NDIS Participants and other customers, ensuring that Participants are informed, empowered and able to maximise choice and control. Staff members 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.



Employees will ensure that RenaissCare proactively manages perceived and actual conflicts of interest in service delivery. Employees will:

- Manage, document and report on individual conflicts as they arise, and
- Ensure that advice to a Participant about support options (including those not delivered directly by RenaissCare) is transparent and promotes choice and control.

As required by the NDIA 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”.

4. Purpose

To protect RenaissCare interests in impartial and objective decision making and the reputation of RenaissCare by maintaining ethical standards of good judgement, fairness, and integrity in all its dealings. To ensure that in dealing with both internal and external persons, entities, company employees observe the highest standards of ethics and avoid any activity or interest that might reflect unfavourably on their own integrity and good name, or on the good name of RenaissCare.

5. Scope

All employees of RenaissCare.

6. Policy

It is RenaissCare policy that management and employees must:

- Avoid positions of conflict or potential conflict; therefore, all RenaissCare management and employees must avoid placing themselves in a situation that could be or may lead to a conflict of interest or duty, or a reasonable perception of an actual or potential conflict of interest or duty.
- Disclose any material personal interest.
- Any declared conflicts are to be reviewed at 6 monthly intervals to determine any ongoing concerns or further steps to be taken to prevent the conflict

All RenaissCare management and employees must fully and frankly disclose any material personal interests related to the affairs of RenaissCare or external business interests that may lead to an actual or potential conflict of interest or duty, or a reasonable perception of an actual or potential conflict of interest or duty.

If there are family members or friends working within RenaissCare, family members must not directly report to each other at any time. Clear boundaries around reporting structure and reports will be put in place.

7. Procedure

All employees of RenaissCare are to be trained in the conflict of interest policy.

All employees of RenaissCare are to declare any actual, perceived or potential conflict/s of interest to the Directors.

If an employee of RenaissCare is aware or becomes aware of a potential conflict of interest of another employee a report is to be submitted outlining the potential conflict of interest.

If an employee has an actual, potential or perceived conflict of interest they are required to:

- a. Restrict the extent that the private interest could compromise or be seen to compromise their impartiality when carrying out their duties.
- b. Abstain from involvement in official decisions and actions which could be compromised by their private interests and affiliations.
- c. Not use their position or company resources for private gain.

Managing conflicts of interest

- Where possible, any conflicted team member will not be involved in the recommendation of or delivery of services.
- RenaissCare's risk register and/or conflict of interest register will note the ongoing actual or potential conflict of interest and a schedule for revisiting the conflict to determine any ongoing concerns or further steps to be taken to prevent the conflict.
- Participants will be presented with a range of choices about providers of supports and not only RenaissCare and staff will not seek to influence the customer to select RenaissCare.

Notes will be made in the CRM database confirming the advice given to the Participant.