

## Summary

Under the National Disability Insurance Scheme (NDIS), Life Without Barriers (LWB) offers a suite of Products: Shared and Supported Living, Health Therapy and Wellbeing, Lifestyle Supports and Support Coordination. While the majority of service delivery pertains to direct support products, NDIS Support Coordination is increasingly requested.

Support Coordination is aimed at supporting and guiding a person to initiate and implement their NDIA plan, including making decisions about their selection of registered providers. This means that clear policy and procedures are required to guide our staff in identifying and managing any actual, or perceived, conflict of interest.

This policy guideline is primarily intended for the delivery of NDIS funded supports, where there is a perceived, potential or actual conflict of interest; that is it applies where we deliver dual supports, both Support Coordination and any direct service. It also applies where an LWB case manager holds decision making authority for a child or young person in Out of Home Care (OOHC) and who may be tasked with selecting a provider of Support Coordination, and or a provider of direct supports for a child or young person.

This policy supplements the Human Resource policy on conflict of interest. Together both offer guidance to staff in relation to a perceived, potential or actual conflict of interest in their work.

## Who should read this document?

All staff involved in the management or delivery of supports to people with a disability with NDIS funding.

## What is our aim?

Irrespective of the supports being delivered our aim is to ensure our staff are guided to:

- consistently deliver high quality supports and work within the law
- demonstrate evidence of meeting the National Standards for Disability
- deliver support that is aligned with the client's preferences, goals and needs
- to offer the client real choice and options, avoiding any perceived, or actual, conflict of interest.
- to work within the Terms of Business as an NDIS registered Provider.

## Principles

LWB works within a set of principles to guide and direct staff, ensuring that there is no perceived, potential or actual conflict of interest when providing advice, information and coordination of supports to our clients. Particularly with respect to our existing roles:

- as a registered provider of direct support under NDIS
- as a registered provider of NDIS funded Coordination of Supports

- as a decision maker for children in OOHC (NSW).

## **Our Principles:**

- To present each NDIS client genuine choices and options in relation to the selection of paid and unpaid supports.
- To acknowledge that clients will seek support from those close to them in helping them make a decision.
- To ensure, as a decision maker for children and young people in OOHC, the selection of the most appropriate provider for any NDIS funded supports.
- To declare any potential conflict of interest to the client; that is any dual role in relation to the Coordination of Supports and the provision of direct support.
- To ensure that any decisions about the selection of LWB for both Support Coordination and direct supports, are made by the NDIS client, or others who have the authority to make those decisions.
- To actively promote the use of informal or mainstream supports where available.
- To build the capacity, where possible, of each NDIS client so that they are able to self-manage some or part of their own Support Coordination.
- To encourage evidence-informed decisions in relation to available options.
- To focus on outcomes in any work undertaken.
- To declare any perceived, potential or actual conflict of interest.
- To make transparent any situations that exist where we are both the provider of direct supports and the coordinator of supports.

## **Our Practice:**

- To separate, wherever practical, through organisational arrangements, referrals, management and delivery of Coordination of Support from the delivery of all other supports for which we are registered for under NDIS.
- To encourage our clients to access independent information, support, advice and representation; ensuring the involvement of those known and trusted by the client to support them in their decision making.
- To record individual discussions with clients in relation to alternate provider options, where LWB is the client's preferred provider of direct supports and Support Coordination.
- To document any arrangements where the NDIS client gives explicit, informed, consent that they wish us to perform a dual role.
- To have a line manager approve the delivery of Support Coordination and direct supports as well as approve the delivery of OOHC case management (NSW) and Support Coordination, or OOHC case management and any other support delivered by LWB as an NDIS registered provider.
- To seek and respond to feedback from our NDIS clients.

- To deploy staff who have the requisite level of qualification and experience to perform the Support Coordinator function, and that they receive guidance about managing any perceived, potential or actual conflict of interest encountered in their role.
- To offer no remuneration to staff for participant volume.
- To audit compliance with this policy.

## Relevant National Standard for Disability

The National Standards for Disability (revised 2012) apply in full to this policy guideline. There are six National Standards that apply to disability service providers.

1. **Rights:** The service promotes individual rights to freedom of expression, self-determination and decision-making and actively prevents abuse, harm, neglect and violence.
2. **Participation and Inclusion:** The service works with individuals and families, friends and carers to promote opportunities for meaningful participation and active inclusion in society.
3. **Individual Outcomes:** Services and supports are assessed, planned, delivered and reviewed to build on individual strengths and enable individuals to reach their goals.
4. **Feedback and Complaints:** Regular feedback is sought and used to inform individual and organisation-wide service reviews and improvement.
5. **Service Access:** The service manages access, commencement and leaving a service in a transparent, fair, equal and responsive way.
6. **Service Management:** The service has effective and accountable service management and leadership to maximise outcomes for individuals.

## Relevant LWB Policy statement(s)

The most relevant organisation wide policy statements that underpin the philosophy and principles to guide our operations and service delivery are:

- [2.1 Assessment and Planning](#)
- [2.5 Coordinating Services and Programs](#)

Other policy guidelines that relate to this policy guideline include:

- National Disability Insurance Scheme Policy Guideline.

## Related legislation

- United Nations Convention on Rights of Persons with Disabilities
- National Disability Agreement
- Disability Discrimination Act 1992 and related standards
- Disability Services Act and complementary legislation
- NDIS Quality and Safeguarding Framework
- Equal Employment Opportunity legislation
- Other relevant State/Territory legislation
- Public Service Acts