# Conflict of Interest

## Policy

*futures in sight* is committed to ensuring that actions and decisions taken at all levels in the company are informed, objective and fair.

A conflict of interest may affect the way a person acts, the decisions they make, or the way they vote on group decisions. Conflicts of interest must be identified and action taken to ensure that personal or individual interests do not impact on the service, activities or decisions of *futures in sight.*

A conflict of interest may be actual, perceived or potential.

## **Scope**

## All Partners, Employees, Contractors and Volunteers

## **Principles**

All Partners, Employees, Contractors and Volunteers of *futures in sight* are required to act in the interests of *futures in sight* to:

* protect the interests of *futures in sight* through impartial and objective decision making;
* protect the reputation of *futures in sight* by maintaining ethical standards of good judgment, fairness and integrity in all dealings;
* immediately declare any potential or actual conflict of interest; and
* refuse gifts or benefits that may influence a decision or could be perceived to influence a decision.

All Partners, Employees, Contractors and Volunteers of *futures in sight* must declare and manage any actual or perceived conflicts of interest.

## **Definitions**

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| **Conflict of Interest** | An actual, perceived or potential situation in which a person has a private or personal interest which can appear to influence the decisions they make as a Partner, Contractor or Volunteer of fis. |

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## **Related Documents**

* Code of Ethics
* Governance Policy
* Transparency and Accountability

Legislation

Disability Inclusion Act (2014)

National Disability Insurance Scheme Act (2013)

Procedure

Registration of Known Conflicts of Interest

A Register of Conflicts of Interest will be kept and all Partners, Employees, Contractors and Volunteers (if applicable) of *futures in sight* will be asked to declare:

* Potential or actual conflicts of interest that exist when first connecting with *futures in sight*
* Conflicts of interest that arise during their involvement with the company.

The register will be maintained by the designated *futures in sight* Partner (Barbel Winter). All potential and actual conflicts will be recorded in the register, showing:

* the name of individual;
* their role in the company;
* the nature of the interest they hold;
* the date of record; and
* any incidents that arise where the interest comes into conflict with the interests of the company, the date of the incident and a summary of how it was managed.

Identification and declaration of conflicts that arise

All Partners, Employees, Contractors and Volunteers are required to declare any potential or actual conflicts of interest they are aware of by:

* **At the beginning of a meeting or decision making process** informing the meeting if a conflict becomes apparent;
* **Outside a meeting:** inform the designated *futures in sight* Partner (Barbel Winter) when a conflict becomes apparent; or
* **In writing** to the designated *futures in sight* Partner (Barbel Winter)

Where any new agreement or contract is entered into Partners, Employees, Contractors and Volunteers must declare any conflict of interest as soon as they become aware of it.

Management of Conflicts of Interest

Where a conflict of interest is declared or identified:

## **For Partners and Advisory Panel members:**

* The *futures in sight* Partners will assess whether a conflict exists;
* If a matter cannot be resolved, all Partners will decide on the action to be taken. This may include asking Partners with declared/potential conflicts of interest to:
* contribute to the discussion but abstain from making a decision on the matter;
* observe but not take part in the discussion or decision making; and/or
* leave the meeting during discussion and decision on the matter.
* Partners with a significant and ongoing conflict of interest may be asked to:
* take leave of absence;
* leave the partnership (based on processes identified in the confidential Partnership Agreement).
* the declaration of conflict of interest will be recorded by the designated *futures in sight* Partner (Barbel Winter) along with any action taken.

## **For** Employees, **Contractors and Volunteers:**

It is possible that Employees, Contractors and Volunteers undertaking work for other organisations or government agencies may find themselves in a situation of conflict of interest. Employees, Contractors and Volunteers will declare any potential conflict of interest to the designated *futures in sight* Partner (Barbel Winter) and:

* The conflict will be assessed by the Partners;
* If a conflict of interest exists, or there is a perception that a conflict exists, the Partners/Partner representative together with the Employee, Contractor or Volunteer will determine the actions needed to be undertaken to ensure that the conflict is minimised and presents no level of risk to *futures in sight*. These actions may include but not be limited to:
* The Employee, Contractor or Volunteer contributing to discussion on a matter but abstains from taking part in decision-making;
* The Employee, Contractor or Volunteer attends meetings as an observer and does not take part in the discussion or decision making; and/or
* The Employee, Contractor or Volunteer steps aside and another Contractor is engaged to undertake the work until the conflict of interest is no longer present.

## **In our work with participants:**

*futures in sight* provides a range of supports to participants under the NDIS including Coordination of Supports, some capacity building supports, as well as plan management supports.

We provide information about all of our services provided under the NDIA .

Participants/ their nominees understand that they have complete choice in who is to provide their services and that this choice does not impact on the provision of the support provided by *futures in sight*.

If we provide Coordination of Supports to a participant, we may make referrals to other providers in line with the participants’ NDIS plan and choice and we document those referrals.

## **Information for Partners, Employees, Contractors and Volunteers**

Conflict of Interest policy will be made available to all the above.

**Review**

This policy will be reviewed on a two-yearly basis.

However, if at any time the legislative, policy or funding environment is so altered that the policy is no longer appropriate in its current form, the policy shall be reviewed immediately and amended accordingly.

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| Signed by all Partners | Original signed by all Partners | | |
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