



1. Statement

Lighthouse Disability provides supported independent living to clients living with disability. Lighthouse Disability is committed to ensuring client's support and service needs are met in a way that maximises choice and independence and shared decision-making with the client, their family/guardian(s). As an NDIS provider who provides Plan Management for some of our clients, Lighthouse Disability closely monitors and ensures we act with integrity, honesty and transparency under the NDIS Code of Conduct and the NDIS Practice Standards.

Lighthouse Disability is committed to ensuring National Disability Standards and the National Disability Insurance Scheme Practice Standards are reflected in our organisational culture and ways of working. As an organisation we are committed to ensuring our practices align with these standards for the benefit of the clients we work with. This includes monitoring and ensuring there is no conflict of interest where we provide Plan Management.

2. Summary

The Conflict of Interest; Plan Management Policy (the Policy) is to assist Plan Managers of Lighthouse Disability Limited (the Company) to appropriately identify, disclose and manage any actual, potential or perceived conflict of interests and deal with those conflicts of interest in a transparent, consistent and lawful manner in order to protect the integrity of the Company and manage risk and ensure clients receive the support and services they want and need.

3. Scope of this Policy

This policy applies to all Plan Managers.

4. Purpose


The purpose of this policy is to ensure Plan Managers are aware of their obligations under the NDIS Code of Conduct and NDIS Practice Standards to disclose any conflicts of interest in their role they may have and to ensure any conflict of interest is effectively managed, in line with this policy.

5. Definition Conflict of interest

In the context of this policy a conflict of interest will occur when a Plan Manager interests in working for the service provider, conflict with their responsibility to act in the best interests of the client.

This has the potential to occur where the Plan Manager is employed by the service provider and these interests may make it difficult to fulfil their professional duties without bias or the perception of bias. A conflict of interest can be actual, potential or perceived. It may also be financial or non-financial.

An actual conflict of interest is where a person is being influenced by a conflicting interest. In this context an example may include when the Plan Manager is considering brokering a service provided by Lighthouse Disability when a more appropriate service for the client is provided by another provider.

Title:	SERV-POL Conflict of Interest Plan Management V1		
Authorised by:	Michelle Holian CEO	Authorising signature:	
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A perceived conflict of interest is when it could appear a Plan Manager is being influenced by a conflicting interest. An example may include when the Plan Manager is reviewing quotes for a service and appears to only consider a service provided through Lighthouse Disability. It may be that the Plan Manager believed they can made an impartial decision in the best interest of the client, but others may perceive it as being made in the organisation's own interest.

6. Reducing Risk of Conflict of Interest

In acting to reduce the risk of potential or perceived conflict of interest Lighthouse Disability is transparent in informing the client family/guardian(s) of its role as the NDIS service provider and accommodation provider who is managing the property. This information is provided as part of;

- Our public information resources (i.e. on our website, information brochures etc.)
- The intake process
- Discussions with the client, family/guardian(s) about available and appropriate accommodation services
- Conflict of Interest policies included in welcome/onboarding packs
- Service Agreements with clients
- The consent process

7. Principles of Plan Manager Role

Plan Managers should adhere to the principles outlined in this policy to minimise the risk of an actual or potential conflict of interest arising and;

- Adhere to the NDIS Code of Conduct and Practice Standards in relation to their role
- Take all practical steps to avoid conflicts of interest, where possible, which does, or may, interfere with their obligations as Plan Managers with Lighthouse Disability
- Support clients to connect with other service providers to increase their choice of providers and have access to the widest choice of NDIS providers to suit their need
- Actively engage with clients in the management of their NDIS funds to facilitate and enable them to exercise choice and control over their budget and finances, when choosing providers and receiving the services and support they want and need Support clients to increase their financial and plan management skills including how to manage their own Plan, review and understand their NDIS budget plans and have greater budget oversight
- Actively support the client to broker appropriate services within and as best use of the client's budget
- Monitor and plan budgets to appropriately meet the needs goals and expectations of the client
- Build client knowledge and capacity to understand their budget and how to use their funding to support effectiveness including advising them on what can and cannot be funded
- Build the capacity and confidence of clients to actively identify and engage with opportunities for appropriate services that support resilience
- Support and facilitate access to an independent advocate where indicated or requested
- Actively seek client feedback and support clients to make a complaint when they are not satisfied with the services they receive
- Maintain integrity by declaring and avoiding any real or perceived conflicts of interest
- Avoid engaging in, participating in or promoting sharp practices
- As soon as reasonably practical upon identifying an actual or potential conflicts of interest, disclose it Chief Executive Officer.

Is this a public facing document?	Yes		
This document is to be reviewed:		Every two years	
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8. Plan Manager Role

Lighthouse Disability recognises there is a potential for real or perceived conflict of interest in its role as a NDIS provider and its Plan Manager role and the potential for real or perceived bias in the delivery of services to its clients. The client’s goals for personal support, health support and activities of daily living will be negotiated with the client and where appropriate, their family/guardian/s. This forms the framework by which Plan Managers will plan and coordinate and identify and broker services on behalf of the client.

In its awareness of this actual or potential conflict of interest and consistent with the NDIS Code of Conduct, Lighthouse Disability is diligent in monitoring and ensuring that Plan Managers;

- Support clients developing and managing their NDIS funding appropriate to the clients expressed goals, needs expectations and the services they need/wish to receive consistent with the clients rights to exercise choice and control over their life
- Support the client to
- Work with Lighthouse Disability as the service provider, and any other service provider the client uses to ensure prompt payment (and reimbursement when indicated), invoicing and any other service related matters on behalf of the client
- Support the client by validating invoices and submitting pay requests on time and maintaining current and clear records of these transactions to inform the client
- Provide end to end claim submission services in the NDIS Portal
- Take responsibility to ensure all claims issues are resolved
- Proactively inform the client, through regular reports and statements about spend and available funds, and immediately report to the client when the Plan Manager identifies and overspend or underspend of the client’s funds
- Work with the client to reduce any potential and reasons for overspend or underspend and discuss with the client effective and efficient ways to utilise approved funds
- Regularly check to make sure the services meet the ongoing client’s needs and cancel or withdraw services that no longer meet their needs or the client is dissatisfied.

9. Dissatisfaction with Plan Manager

Where a client is not satisfied with the Plan management services provided by Lighthouse Disability, the Plan Manager will advise clients about the rights to;

- Inform the current Lighthouse Disability Plan Manager in writing to cease services as per the client’s service agreement
- Contact the NDIA on 1800 800 110 to inform them the client would like Plan Management

Lighthouse Disability Plan Managers will actively help and facilitate a smooth handover to the incoming provider to ensure the client continues to get the services they need. Plan Managers will actively inform clients of their rights to give feedback and make a complaints and actively encourage and support clients, their family/guardians to provide feedback and/or make a complaint to;

- the service provider
- and where indicated or requested, to the NDIS Commission

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10. Breach of Policy

A failure to disclose a conflict of interest is a breach of the NDIS Code of Conduct and NDIS Practice Standards. Lighthouse Disability will raise any concerns with the NDIS Commission should we become aware of situations where a Plan Manager's real or perceived conflicts of interest may be adversely affecting client outcomes.

11. Related Documentation

Lighthouse Disability

- Compliments and Complaints Policy
- Client Choice and Control in Decision Making Policy
- Decision-making arrangements for clients with impaired decision-making capacity Fact Sheet

NDIS Quality and Safeguards Commission:

- Plan Managers and Conflict of Interest
- Practice Standards and Quality Indicators
- Code of Conduct

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