



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 supported independent accommodation and may also be the property owner 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 act as both the service provider and property owner.

Specialist disability accommodation (SDA): is a range of housing designed for people with extreme functional impairment or very high needs. SDA homes are constructed to be more accessible. They enable better or safer delivery of other supports needed by clients. SDA usually involves a shared home with a small number of other people.

2. Summary

The Conflict of Interest for SDAs Policy (the Policy) is to assist 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 Specialist Disability Accommodation services (SDAs) provided by Lighthouse Disability

4. Purpose

The purpose of this policy is to ensure all staff 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. Conflict of interest

Conflicts of interest arise when the Company's interests compete with or are different from those of the client. Interests can be financial and/or business and can be either direct or indirect. A conflict of interest can be actual, potential or perceived. It may also be financial or non-financial.

Title:	SERV-POL Conflict of Interest SDA V1		
Authorised by:	Michelle Holian CEO	Authorising signature:	
Next review	17/03/24	Date Approved:	17/03/22



In the context of this policy a conflict of interest will occur when the Company’s interest, as the property owner and client property owner, conflict with their responsibility to act in the best interests of the client as the service provider and fulfil its duties without bias or the perception of bias.

An actual conflict of interest is where the Company is being influenced by a conflicting interest. In this context an example may include when the Company is considering filling a service vacancy at a property it owns when a more appropriate service for the client is provided in another service vacancy the company does not own that better meets the client’s needs

A perceived conflict of interest is when it could appear the Company is being influenced by a conflicting interest. An example may include when the Company appears to be prioritising or only recommending its own properties. It may be that the Company believed they can made an impartial decision in the best interest of the client, but others may perceive it as being made in the Company’s own interest.

Lighthouse Disability recognises there is a potential risk for real or perceived conflict of interest in its role as a NDIS provider and Accommodation provider who is managing the property and the potential for real or perceived bias in the delivery of services to its clients.

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

We actively inform clients, family/guardian(s) and ensure they understand and agree to this service, where the Lighthouse Disability SDA Agreement is;

- Rent only
- Rent and Board or
- Board only

Lighthouse Disability is diligent in monitoring SDA Agreements and ensuring that we;

- Actively include and engage clients, their family/guardian(s) in discussions about how their Supported Independent Living services (accommodation services) are provided and ensure the service design category, building type and location meet their specific needs
- Endeavour to provide the service in a timely manner whilst ensuring the service meets the client specific needs within their Plan
- Informing the client in an open and honest way, if we do not believe we can provide the accommodation service they need
- Communicate openly and honestly in a timely manner with the client, family/guardian(s)

Is this a public facing document?	Yes		
This document is to be reviewed:		Every two years	
Approver: CEO	Effective Date: 17/3/22	Review Date: 17/3/24	
Responsible Manager: General Manager, Finance	Version Number: V1		



- Protect the privacy and confidentiality of the client with regards all information maintained by Lighthouse Disability in providing the accommodation service. This includes limiting access to client information strictly to those employees who require it to provide a specific NDIS service.
- Provide services in a way that complies with all relevant laws, including the *National Disability Insurance Scheme Act 2013* and rules, and the Australian Consumer Law
- Comply with all professional standards, quality requirements and codes of conduct
- Keep accurate records of the supports provided and provide them on request
- Issue invoices and statements of the accommodation services delivered to the client as required under relevant consumer laws
- Account for all expenses covered by the Board Payments monthly and annually and provide the statement to the client, family/guardian(s) where requested
- Assist the client, family/guardian(s) to contact the NDIA when asked or required at their request
- Assist the client, family/guardian(s) to attend a hearing or other NDIS or government complaint body where they wish to make a complaint about the Accommodation Provider
- Review the clients accommodation services with the client, family/guardian(s) at least once a year or as circumstances change
- Actively support and assist the client should they wish to move out of the accommodations service including to support them to find alternative accommodation and transition to that service

Lighthouse Disability will write to the client, family/guardian(s) within five (5) business days if the contact details shown in the SDA Agreement change and discuss and review the accommodation service and the Service Agreement the client, family/guardian(s) and any changes to the Service Agreement will be made in writing, signed, and dated in agreement with Lighthouse Disability and the client, family/guardian(s). We will give the client, family/guardian(s) required notice if the Service Provider needs to end the Service Agreement.

Lighthouse Disability will actively seek and listen to client, family/guardian feedback to assist us in identifying and resolving issues that arise quickly and satisfactorily before they escalate.

We will actively inform the client, family/guardian(s) 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.

7. Duty of SDA Provider

It is the duty of Lighthouse Disability as an SDA provider to adhere to the NDIS Code of Conduct and Practice Standards in relation to their role to;

- Connect with clients in the management of their accommodation services to assist them to exercise choice and control when choosing providers
- Support clients to connect with other accommodation service providers including community and government services when indicated/requested
- Plan and monitor accommodation services to appropriately meet the needs, goals and preferences of the client
- Support and facilitate access to an independent advocate where requested or indicated
- Actively seek client feedback and support clients to make a complaint when they are not satisfied with the accommodation services they receive.

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- Adhere to the principles outlined in their policy to minimise the risk of an actual or potential conflict of interest arising
- Take all practical steps to avoid conflicts of interest, where possible, which does, or may, interfere with obligations to the Company
- As soon as reasonably practical upon identifying an actual or potential conflicts of interest, disclose it Chief Executive Officer and act to rectify and/or mitigate this risk

8. 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 real or perceived conflict of interest may adversely affect the client and their best interests.

9. 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
- Health Support Policy

NDIS Quality and Safeguards Commission:

- Support Coordinators and Conflict of Interest
- Practice Standards and Quality Indicators
Code of Conduct

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