



# Conflict of Interest Policy

*For Soaring Sparrows Pty Ltd*

## Document Control

- **Policy Title:** Conflict of Interest Policy and Procedure
  - **Date Policy Developed:** 16/09/2025
  - **Review Date:** 16/09/2027
  - **Version:** 1.1
  - **Policy Owner:** Director
- 

## Purpose

This policy ensures that Soaring Sparrows Pty Ltd identifies, manages, and responds to actual, potential, or perceived conflicts of interest in the delivery of NDIS support coordination and other services. The aim is to maintain transparency, fairness, and trust for participants, in compliance with the NDIS Code of Conduct and Practice Standards.

---

## Scope

This policy applies to:

- All directors, staff, contractors, and volunteers of Soaring Sparrows Pty Ltd.
  - Situations involving participants, families, advocates, and service providers.
- 

## Definitions

### Conflict of Interest

A situation where a person's personal, financial, or other interests may influence, or appear to influence, their ability to act in the best interests of participants.

### Actual Conflict of Interest

A real situation where a staff member's personal, financial, or professional interests directly conflict with their duties to participants or the organisation.

**Potential Conflict of Interest**

A situation where a conflict could reasonably be expected to develop in the future.

**Perceived Conflict of Interest**

A situation where others may reasonably believe that a person's personal interests could improperly influence their decisions, even if no actual conflict exists.

**Splose**

The secure case management system used by Soaring Sparrows Pty Ltd for recording participant information, including Conflict of Interest Forms, approvals, and related records.

**NDIS Code of Conduct**

The legally binding rules that apply to all NDIS workers and providers, requiring safe, ethical, and respectful conduct when providing supports and services.

**NDIS Practice Standards**

The quality requirements that registered NDIS providers must meet, including managing conflicts of interest in service delivery.

---

**Policy Statement**

Soaring Sparrows Pty Ltd is committed to providing services that are participant-centred, free from bias, and based on informed choice and control. We will:

- Disclose and manage conflicts of interest in a transparent manner.
- Prioritise the rights and interests of participants at all times.
- Ensure participants are not pressured into using specific services, providers, or products.
- Provide participants with full choice of providers, including those not affiliated with Soaring Sparrows Pty Ltd.
- Maintain records of identified conflicts and how they are managed in accordance with NDIS requirements.

---

**Responsibilities****Director/Management:**

- Ensure systems are in place to identify and manage conflicts of interest.
- Review and approve all conflict of interest declarations submitted via Splose.

- Monitor compliance with this policy.
- Provide staff with training and guidance.

#### **Staff/Contractors:**

- Disclose any actual, potential, or perceived conflicts of interest as soon as they arise.
- Complete the **Conflict of Interest Form in Splose**, submit it for Director approval, and ensure it is linked to the relevant participant file.
- Refrain from exploiting personal or financial relationships with participants.
- Provide unbiased information about service options.
- Avoid receiving gifts, benefits, or payments that may influence decision-making.

#### **Participants:**

- Have the right to be informed of any conflicts of interest.
  - Have the right to make their own decisions about services and providers.
- 

### **Procedures**

#### **1. Identifying Conflicts of Interest**

- Staff must disclose relationships, financial interests, or other situations that may compromise impartiality.
- Examples include: recommending a service provider where the staff member has a personal connection, or accepting gifts from a participant.

#### **2. Declaring Conflicts**

- Staff must complete a **Conflict of Interest Form in Splose** immediately upon identifying a conflict.
- The completed form is submitted to the Director for review and approval.

#### **3. Approval and Record-Keeping**

- The Director reviews the declaration, determines appropriate management actions, and approves or escalates as required.
- The approved Conflict of Interest Form is stored securely on the participant's Splose file.

#### **4. Managing Conflicts**

- Actions may include reallocating staff, documenting disclosures, or setting boundaries.
- Participants are informed of the conflict and alternative options are offered.

#### **5. Gifts and Benefits**

- Staff may not accept gifts, money, or benefits from participants beyond small tokens of appreciation (e.g., handmade card).
- Any offered gift must be reported and recorded in Splose.

#### **6. Transparency with Participants**

- Participants are informed at intake of their rights to choice and control, and how conflicts of interest are managed.

---

#### **Related Legislation**

- NDIS Act 2013
- NDIS Code of Conduct
- NDIS Practice Standards
- Corporations Act 2001 (Cth)
- Fair Work Act 2009 (Cth)

---

#### **Other Relevant Documents**

- Participant Rights and Responsibilities Policy
- Privacy and Confidentiality Policy
- Equity, Anti-Discrimination and Workplace Harassment Policy
- Risk Management Policy
- Code of Conduct

---

#### **Review**

This policy will be reviewed every two years, or earlier if:

- Legislative or regulatory changes occur.
- Feedback indicates improvements are required.
- An audit, review, or incident highlights a gap.

---

### **Approval**

Approved By: Kathryn Soar

Position: Director, Soaring Sparrows Pty Ltd

Date: 19/09/2025

---