

1. Introduction

1.1. Purpose

This Policy serves as a comprehensive guide for our ongoing efforts to mitigate the risks associated with conflicts of interest. It outlines the procedures and strategies we implement to ensure that conflicts of interest are identified, reported, and effectively managed. The Policy is also designed to ensure compliance with the Governance and Operational Management NDIS Practice Standard

1.2. Scope

This Policy is applicable to all Workers affiliated with Pivotal Connect. It is the responsibility of every individual, regardless of their employment status, to fully comprehend and comply with the commitments outlined in this policy. All Workers must acknowledge that they have read, understood and will comply with the contents of this Policy.

1.3. NDIS Indicators (Objectives)

Governance and Operational Management

Outcome: Each participant's support is overseen by robust governance and operational management systems relevant (proportionate) to the size, and scale of the provider and the scope and complexity of supports delivered. To achieve this outcome, the following indicators should be demonstrated:

- a) Opportunities are provided by the governing body for people with disability to contribute to the governance of the organisation and have input into the development of organisational policy and processes relevant to the provision of supports and the protection of participant rights.
- b) A defined structure is implemented by the governing body to meet a governing body's financial, legislative, regulatory and contractual responsibilities, and to monitor and respond to quality and safeguarding matters associated with delivering supports to participants.
- c) The skills and knowledge required for the governing body to govern effectively are identified, and relevant training is undertaken by members of the governing body to address any gaps.
- d) The governing body ensures that strategic and business planning considers legislative requirements, organisational risks, other requirements related to operating under the NDIS (for example Agency requirements and guidance), participants' and workers' needs and the wider organisational environment.
- e) The performance of management, including responses to individual issues, is monitored by the governing body to drive continuous improvement in management practices.

- f) The provider is managed by a suitably qualified and/or experienced persons with clearly defined responsibility, authority and accountability for the provision of supports.
 - g) There is a documented system of delegated responsibility and authority to another suitable person in the absence of a usual position holder in place.
 - h) Perceived and actual conflicts of interest are proactively managed and documented, including through development and maintenance of organisational policies.
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2. *Policy Statement*

At Pivotal Connect, we are committed to maintaining the highest standards of integrity, transparency, and ethical conduct in all our operations. Our Conflict of Interest Policy is a fundamental component of our commitment to ensuring fair and impartial decision-making processes and protecting the best interests of our participants. This policy outlines our procedures and strategies to identify, report, and effectively manage conflicts of interest within our organisation.

2.1. Relevant legislation

All relevant legislation to this Policy is outlined in the Legislation Register.

2.2. Related documents

- a) Conflict of Interest Declaration
 - b) Conflict of Interest Register
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3. *Responsibilities and Roles*

- a) Pule Salafai is responsible for the development and review of this policy. It is expected that Pule Salafai ensures this Policy remains compliant with all applicable laws, regulations and standards.
 - b) Key Management Personnel play a vital role in ensuring the effective implementation of this Policy throughout Pivotal Connect. It is the responsibility of all Key Management Personnel to not only assist Workers in understanding and complying with this policy but also to comply with it themselves. By leading by example, they demonstrate the importance of adherence to the policy and foster a culture of compliance within the organisation.
 - c) Workers are responsible for understanding the contents of this policy and complying with all procedures applicable to them.
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4. *Definitions*

Pivotal Connect means Pivotal Connect PTY LTD ABN 32 674 328 182.

Key Management Personnel means Pule Salafai and Matthew Yakas and other key management personnel involved in Pivotal Connect from time to time.

Director means Pule Salafai .

Worker means a permanent, fixed term or casual member of staff, a contractor or volunteer employed or otherwise engaged by Pivotal Connect and includes the Director.

5. *Procedures*

5.1. **Initial Declaration of Conflicts of Interest**

- a) Upon commencing employment with Pivotal Connect, all Workers must declare in writing any existing conflicts of interest that might impact the delivery of their support and services to a Participant. This includes matters of:
 - 1) financial
 - 2) business; or
 - 3) personal nature

including relationships with other entities like businesses and organisations

5.2. **Ongoing Conflict of Interest Management**

- a) If Workers develop any potential conflict of interest during their tenure at Pivotal Connect, they are required to immediately disclose it in writing to management.
- b) Workers must document and report any conflicts as they arise and devise ways to manage and mitigate the risks associated with these conflicts.

5.3. **Conflict of Interest in Support Coordination**

- a) In the event Pivotal Connect is providing both support coordination and other supports, Participants should be informed of potential conflicts of interest and this policy should be explained to the Participants in a manner they can easily understand.

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- b) All Participants should be treated equally when providing support coordination services, with no Participant receiving special favour or advantage over others in the provision or receipt of supports.
- c) Support Coordinators are responsible for ensuring that Participants maintain their autonomy and control in selecting support services. This involves providing Participants with potential alternative providers who can fulfill the necessary support needs, without any attempts to influence their decision towards choosing Pivotal Connect.
- d) When obtaining quotes for services on behalf of a Participant, Support Coordinators should, if possible, provide at least three quotes from other services, in addition to our own.
- e) To uphold transparency, it is important that Participants are informed, where applicable, of any possible conflicts that may arise with the alternative service providers who have a relationship with Pivotal Connect.
- f) Support Coordinators must communicate to Participants that opting for an alternative provider will have no impact on their support coordination services. All Participants must also be assured that these services function independently of each other, and thus their choice to select an alternative provider carries no repercussions or cause for concern.
- g) Support Coordinators should document in case notes all service providers offered to the Participant, their quotes and the rationale for the Participant's choice of provider for each support category where a provider is engaged.
- h) Participants should be provided with information about the process for requesting a change in service provider, including support coordination, at their initial meeting.

5.4. Training

- a) All Workers of Pivotal Connect are to undergo an initial training to ensure they understand the importance of declaring conflicts of interest and risks to Participants. The training should cover how to manage, document, and report individual conflicts as they arise.

6. *Policy Review and Updates*

This Policy is to be amended and updated according to the requirements to comply with the applicable law.

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