

SUPPORT COORDINATION - CONFLICT OF INTEREST

When we talk about providers with a conflict of interest, we're not talking about bad people doing bad things. We're talking about ordinary people being compromised by difficult situations. A conflict of interest is a situation where a person or organisation has competing interests or loyalties.

When a Support Coordinator is employed by an organisation that offers a range of NDIS funded services, they have a conflict of interest. Most organisations expect staff members (whatever their role) to be ambassadors for the organisation. But it is a Support Coordinator's job to support people to make choices about what is best for them, without bias or receiving incentives.

The NDIS Provider Toolkit clearly conveys expectations for managing conflict of interest when delivering support coordination in conjunction with other supports. It requires that providers retain documentation of:

- Organisational arrangements in place to keep information separate between teams. A best practice approach to keeping information separate may involve separate management for Support Coordination and other service teams within the organisation with discrete lines of reporting from the executive level down to the front line. I encourage providers to have separate client database systems to make sure information on Support Coordination clients is only viewable within the Support Coordination team. It would also be advisable for Requests For Service (RFSs), that now come through to the provider's primary portal, to be diverted directly to the Support Coordination team and not via other service managers.
- A Participant's options for their coordination of supports. This means a Support Coordinator should keep records on the options presented to people when comparing and selecting supports. Support Coordinators may use 1-page bios of providers to help people compare and select their preferred option. Each bio could include a wide range of criteria, ranging from the availability of easy read service agreements to the price per hour of service.
- Documentation that there is no remuneration provided to Support Coordination staff for participant volume. This requires evidence that Support Coordinators are not rewarded for internal referrals to the other services offered by the organisation.

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- Documentation confirming that there are no trailing commissions or percentages on funds managed. Same as above.
- Confirmation that the conflict of interest and above information is disclosed to the people receiving supports. Support Coordinators who work for providers offering a range of NDIS funded services must show evidence of having discussed the implications of this with the people they support. In my training, I suggest Support Coordinators set a clear agenda for their initial meeting with new clients (this is increasingly important as the average hours of Support Coordination allocated in plans is decreasing and each hour must be used wisely). The agenda should include discussing conflict of interest.

Conflict of interest is not the act of doing something wrong. It is just a state of being that arises when Support Coordinators are not completely independent. But, with the right systems and processes in place, the risk that a conflict of interest will disadvantage a Participant can be mitigated.