



Conflict of Interest Policies & Procedures

Shop 5, 38 Princess Street
Bundaberg East Qld 4670

07 4361 6848

www.123supports.com

www.facebook.com/123supports

ABN: 14 930 943 229

TABLE OF CONTENT

Policy / Procedure	Page
CONFLICT OF INTEREST	3
Scope	3
Conflicts of Interest Identification	3
NDIA Compliance and Transparency Requirements	4
Policy Commitments and Participant Rights	4
Definitions	5
Principles	7
Roles and Responsibilities	7
Conflict Management Procedures	8
Types of Conflicts of Interest	9
Areas of High Risk	9
Foreign Influence or Interference	10
Staff External Professional Activities and Secondary Employment	10
Conflicts of Commitment	10
Staff Involvement in External Activities	10
Training and Oversight	11
Registering Conflicts of Interest for Management	11
Failure to Declare a Conflict of Interest	11
Privacy and Confidentiality	11
Further Advice or Assistance	11
Effectiveness and Review	12

CONFLICT OF INTEREST

Scope

123 Support Services is approved as a registered provider of plan management, support coordination, and a wide range of other supports under the National Disability Insurance Scheme Training and Oversight

- The Conflicts of Interest Policy is covered during staff induction.
- The policy is always accessible to staff via staff manual, Employment Hero and the IOE website.

• Team Leaders are responsible for ensuring staff understand and follow conflicts of interest procedures. e (NDIS). 123 Support Services acknowledges the inherent risk of actual or perceived conflicts of interest in delivering multiple services to a participant.

This document provides a framework for identifying, disclosing, and resolving situations where conflicts of interest exist or may be perceived to exist. It reflects current best practice and aligns with the NDIA 2025-26 guidelines regarding conflict of interest management for registered providers.

This policy covers all divisions of 123 Support Services and applies to all employees and volunteers, appointed representatives and any persons directly or indirectly linked to 123 Support Services (family, friends, or employees and volunteers of other organisations), regardless of location.

Conflicts of Interest Identification

A conflict of interest arises when an individual or organisation (including 123 Support Services) has personal, financial, or other interests that may affect their ability to act impartially and in the best interests of the participant.

Types of conflict include:

- **Actual:** A direct conflict currently exists
- **Potential:** A conflict may arise in the future
- **Perceived:** A reasonable person might believe a conflict exists

Examples include:

- Making decisions for personal or financial gain
- Prioritising one participant or group of participants over another
- Recommending 123 Support Services without providing impartial advice
- Favouring family or friends in decisions
- Acceptance of gifts or incentives from participants or other stakeholders
- Making decisions that result in a benefit to 123 Support Services at the expense of participant choice or control
- Creating an appearance of improper conduct that could affect confidence in, or the reputation of, 123 Support Services

NDIA Compliance and Transparency Requirements

To comply with updated NDIA directions, IOE has taken the following steps:

- 123 Support Services clearly separates roles across plan management, support coordination, and direct supports through dedicated teams, distinct reporting lines, and separate supervision structures. Staff working in these areas are not involved in the delivery or oversight of other 123 Support Services to the same participant.
- 123 Support Services prohibits staff from receiving incentives (financial or otherwise) related to referrals or participant decisions to use 123 Support Services.
- Staff performance is not linked to participant uptake.
- 123 Support Services ensures that participant communication consistently promotes informed choice and control. All service information includes a clear explanation that participants can choose any provider and that IOE offers only one of many available options.
- 123 Support Services maintains a Conflicts of Interest Register, which is actively updated as issues arise and formally reviewed every quarter by the leadership team.
- 123 Support Services will not claim NDIA funds if a conflict is identified and has not been properly disclosed or managed.
- 123 Support Services will not claim NDIA funds where a conflict is unresolved or has not been transparently declared.

Policy Commitments and Participant Rights

To ensure transparency from the outset, a copy of this Conflicts of Interest Policy is sent to all participants along with their service agreement. Acknowledgement of this policy is requested not only at the time of initial engagement, but also whenever a new service agreement is issued, for example, due to price changes or the addition of new services.

1. 123 Support Services ensures administrative, operational, and service-level separation between plan management, support coordination, and other supports.
2. 123 Support Services staff will act in the best interests of participants to ensure they are informed, empowered and able to maximise choice and control.
3. 123 Support Services staff must:
 - Inform participants of their right to choose any provider for any service
 - Provide lists of alternative providers upon request
 - Avoid suggesting that participants must use 123 Support Services
 - Refrain from offering or accepting gifts that could influence decisions
4. 123 Support Services will:
 - Offer services irrespective of how the participant's plan is managed
 - Where it is obvious that 123 Support Services is unable to meet a participant's need, 123 Support Services will provide information on other services that may be more suitable and encourage and support them to engage in services outside of 123 Support Services.
 - Share this policy at the commencement of service
 - Notify participants of any conflicts affecting their services

5. Participants are encouraged to use the grievance procedure or feedback form if they suspect any bias or improper conduct.

Definitions

Except as otherwise specified in this Policy or the Code of Conduct.

Actual conflict of interest	A real conflict between current duties and responsibilities and existing private interests.
<p>Associate</p>	<p>An associate may be:</p> <ul style="list-style-type: none"> • a spouse, sibling, parent or child or other family member or a person ordinarily resident in a staff member's household • an entity of which a staff member or a staff member's nominee is a shareholder, member or officer • a business partner • an employer • any other person or entity who could be advantaged (directly or indirectly) by the improper use of a staff member's position at 123 Support Services or information acquired by the staff member because of that position.
<p>Conflict of commitment (or dual interests)</p>	<p>May arise where an individual has multiple and incompatible commercial and public duties. This may occur, for example, when a staff member has a public role with another organisation in addition to their 123 Support Services duties.</p> <p>123 Support Services staff may have involvements with external organisations such as: serving on a board or committee, holding an honorary appointment with another 123 Support Services, being involved in a Cooperative Research Centre (CRC) or other research project external to 123 Support Services, or serving as a director on a controlled entity of 123 Support Services, or be the founder of a start-up entity. This can often result in dualities of interest or obligation with respect to 123 Support Services and the other organisation. Also referred to as dual interests.</p>
<p>Conflict of Interest</p>	<p>A conflict of interest involves a conflict between the public duty and private interests of a public official, in which the public official has private interests which could improperly influence the performance of their official duties and responsibilities.</p> <p>Arises when a staff member's personal interests, or those of a person with whom they have a close personal relationship, conflict with their primary obligation to act in the</p>

	<p>interests of 123 Support Services. A conflict of interest may be actual, perceived or potential. It can be pecuniary (involving financial gain or loss), or non-pecuniary (based on enmity or amity) and can arise from avoiding personal losses as well as gaining personal advantage, financial or otherwise.</p> <p>Conflict of interest includes conflict of commitment.</p>
Financial (or pecuniary) interest	<p>Any right, claim, title or legal share in something having a monetary or equivalent value. Examples of financial interest include, but are not limited to, shares, share options, share of the profits of commercialisation as per 123 Support Services IP policy, and the right to receive remunerations such as salary, consulting fees, allowances, discounts, and the like.</p>
Foreign influence	<p>All governments, including Australia's, try to influence deliberations on issues of importance to them. These activities, when conducted in an open and transparent manner, are a normal aspect of international relations and diplomacy and can contribute positively to public debate.</p>
Foreign interference	<p>Occurs when activities are carried out by, or on behalf of a foreign actor, which are coercive, covert, deceptive or corrupting and are contrary to Australia's sovereignty, values and national interests.</p>
Perceived conflict of interest	<p>Where a reasonable person might perceive that such improper influence as described in the Conflict of Interest Policy could exist.</p>
Personal relationships	<p>Either family, friend, or other intimate relationship</p>
Potential conflict of interest	<p>Where a conflict may arise in the future between current or future duties and responsibilities and existing or future private interests.</p>
Private (or personal) interests	<p>Refers to any interests that involve potential gain or loss (financial or non- financial) for an individual or for any other person or organisation that individual may wish to benefit (e.g. family, friends, associates) or disadvantage (e.g. competitors, rivals).</p>
Public Official	<p>A public official is anyone in a position of official authority that is conferred by a State, i.e. someone who holds a legislative, administrative, or judicial position of any kind, whether appointed or elected. This definition extends to include officials or agents of public bodies and its staff, such as universities or research institutes.</p>

<p>Responsible Officer</p>	<p>For the purposes of this procedure, a Responsible Officer includes the Chief of Staff, Chief Financial Officer, Director Research and Innovation Services, and Director Human Resources.</p>
-----------------------------------	---

Principles

123 Support Services has a responsibility to ensure that its official activities and those of its staff conform to acceptable standards of integrity and good conduct. It recognises that a well-established system for identifying, declaring, and managing conflicts of interest increases its public accountability and reduces the risk of corruption, misconduct and bias in its operations and decision-making processes.

123 Support Services also recognises that conflicts of interest are not unusual in the exercise of public responsibility and cannot always be avoided.

123 Support Services expects:

- Staff will not allow their external, personal, or financial interests or their duties to any external entity to compromise their duties, obligations, and responsibilities to 123 Support Services.
- All conflicts of interest, regardless of their character or level, will be identified, declared, and managed.
- Any gifts/donations/benefits/sponsorship/hospitality or service will not be accepted by staff if it might be reasonably interpreted as intended to influence current or future behaviour of staff or an individual or Directorate/Office within 123 Support Services. The preservation of academic and professional independence is a paramount consideration and should be made clear to potential sponsors/donors.
- Where a conflict of interest occurs, the interests of 123 Support Services will be balanced against the interests of the staff member. Unless exceptional circumstances exist, the balance of interests will be resolved in 123 Support Services' favour.
- Managers/Supervisors, when notified of a conflict of interest, will deal promptly with the conflict as per the Procedure and put in place arrangements that protect the integrity of the staff member who has declared the interest and 123 Support Services' processes and decision-making.

Roles and Responsibilities

The Director is responsible for the procedures and framework for managing conflict of interests within 123 Support Services.

All Managers are responsible for:

- understanding and complying with this Policy and the Procedures;

- being aware of areas of conflict of interest within their area of responsibility, assessing risks;
- assisting staff who have queries about actual, perceived or potential conflicts of interest;
- seeking advice or support from the relevant Director, where necessary.
- Staff and affiliates are responsible for:
 - understanding and complying with this Policy and the Procedures;
 - assessing their own private and personal interests and whether they conflict or have the potential to conflict with 123 Support Services' interests, including their own duties as staff members;
 - disclosing and managing any actual, perceived or potential conflicts of interest in accordance with the Procedure;
 - where appropriate, being aware of additional, current requirements linked to research; and
 - not making decisions or seeking to influence the decisions of others in matters relating to the staff member's private interest.
- In addition, the Director is the designated Responsible Officers and have specific management responsibility for the functional areas of: Finance, Research and Human Resources respectively. This includes:
 - maintaining a central private and confidential register of disclosures (see section 5 below);
 - supporting the Manager to manage any potential or declared conflicts of interest in their respective functional areas;
 - reviewing and ensuring that management of conflicts of interest for their respective areas complies with this Policy and the Procedures;
 - seeking advice and support relating to the implementation of this Policy, where necessary from the Manager.

Conflict Management Procedures

All conflicts must be managed through a consistent process:

1. **Disclosure:** Employees and volunteers must disclose any potential conflict to their Team Leader.
2. **Assessment:** Team Leader assess and document the conflict, its nature, and risks.
3. **Action:** Mitigation steps may include:
 - Reassignment of duties

- Withdrawal from affected processes
- Participant consultation
- Implementing oversight or independent review ○ In some cases, no specific action may be required beyond declaration of the conflict and acknowledgement by relevant parties

4. **Documentation:** All conflicts and outcomes are recorded in the Conflict of Interest Register. Regardless of the mitigation steps taken, all identified or perceived conflicts must be entered into the register by the relevant team leader and reviewed by the General Manager as part of the organisation's oversight and governance process.

Types of Conflicts of Interest

The Identification, management and monitoring of conflicts of interest are as per the Conflict of Interest Procedure.

Areas of High Risk

There are a number of areas of 123 Support Services activity that are deemed high risk. These include, but are not limited to:

- procurement processes, tenders, and contracts
- gifts, hospitality, and other benefits
- staff recruitment, selection, appointment, re-classification, termination, tenure, promotion, performance management, staff development, conditions of service, recognition, and reward
- issuing, or reviewing the issue of, fines or other sanctions
- providing subsidies, financial assistance, concessions, or other relief to those in need
- making determinations or handing down judgement about individuals or disputes
- assessment or supervision of staff
- exercising financial and other delegations
- all commercialisation activities (including collaborative research, licensing, patents, material transfer) including start-ups and spinouts
- research activities, including disclosure to funding bodies and for individuals responsible for carrying out any part of an investigation of an allegation of research misconduct
- providing ethical or other approval to researchers for intended projects

- funding from commercial entities for educational activities, where the funder may exert undue influence on participants for current or future commercial gain.

Foreign Influence or Interference

Staff need to disclose any activity that may be registerable under the Foreign Influence Transparency Scheme Act as a perceived, potential, or actual conflict of interest. Certain types of international collaborations, research and sensitive or critical infrastructure may be subject to additional controls and obligations under export control laws and national security provisions (including sanction regimes) to protect against Foreign Interference.

This undue influence or interference may occur in subtle or covert ways, therefore effective due diligence and transparency are important mitigating strategies. Where a foreign affiliation, relationship, or financial commitment could be perceived as a conflict of interest, this is to be declared. Conflict of interest management is to be included in service agreements with international partners. Declarations will be important in recruitment processes particularly in sensitive research areas where foreign interference is higher risk.

Staff External Professional Activities and Secondary Employment

Staff are required to be familiar and comply with the Staff External Professional Activities and Secondary Employment Procedure. Staff undertaking these activities are required to register their conflicts particularly where the work undertaken is using a staff member's specialised skills but is otherwise not affiliated with 123 Support Services. Secondary employment which does not utilise the specialised skills that 123 Support Services has employed a staff member for and is not associated with 123 Support Services in any way falls outside the definition of secondary employment and is not required to be declared but may require declaration as part of an individual's employment contract.

Conflicts of Commitment

Conflicts of commitment often involve issues of time allocation and are situations where an individual engages in outside professional activities, either paid or unpaid, that may interfere with their primary obligation and commitments to 123 Support Services. Whenever an individual outside professional activities as defined in the Staff External Professional Activities and Secondary Employment Procedure might impinge on the effective discharge of their 123 Support Services duties (eg time commitment), or whenever a staff member's primary professional loyalty is not to 123 Support Services, a conflict of commitment exists. If a situation arises that raises questions about a possible conflict of commitment, staff must discuss this with their manager.

Staff Involvement in External Activities

123 Support Services encourages and supports staff members becoming involved in community activities and volunteer work in their personal lives. However, it is possible that staff members may undertake volunteer or professional roles outside the organisation that give rise to a conflict of interest, or a perception of conflict (e.g. staff undertaking consultancy work for member organisations or government agencies).

Staff must declare any external employment or volunteer activity that may overlap with their role at IOE. Declarations must be reviewed upon commencement and whenever circumstances change.

Training and Oversight

- The Conflicts of Interest Policy is covered during staff induction.
- The policy is always accessible to staff via staff manual, Employment Hero and the 123 Support Services website.
- Team Leaders are responsible for ensuring staff understand and follow conflicts of interest procedures.

Registering Conflicts of Interest for Management

At 123 Support Services, the Director and Management Group and roles at higher risk of encountering conflicts (including procurement or HR) are required to register their pecuniary and non-pecuniary interests on commencement of employment, and this is reviewed annually.

The purpose of the declaration is to ensure that the Director is aware of any private interests or relationships of leadership or other sensitive positions which could or could be seen to influence the decisions the Director or Management Group are taking or the advice they are giving. These could include personal interests and relationships that could involve real or potential conflicts of interest in terms of the Manager's responsibilities.

The completion of a declaration of interests also provides the Director or specific staff with the opportunity to consider whether any of their financial or personal interests might give rise to a real or perceived conflict with their duties and take action to remove or minimise the potential for that to occur. The registration or declaration of conflicts of interest does not in itself necessarily resolve any conflict. Additional measures to positively resolve or manage conflicts of interest should also be considered.

Failure to Declare a Conflict of Interest

Staff have an obligation to declare and manage conflicts of interest. Failing to comply with the provision of this Policy and Procedures, including refusal to take any reasonable action as directed to resolve a conflict of interest may constitute misconduct or serious misconduct, which may result in disciplinary action or termination of employment.

Breaches of this Policy and Procedures may also result in referral to, and action being taken by, an external statutory authority and/or agency including the Crime and Corruption Commission.

Privacy and Confidentiality

Information arising from conflict of interest declarations will be managed in accordance with the Information Privacy Policy.

Information held may be used for 123 Support Services purposes including audit, reporting, compliance monitoring and other purposes required by government or legislation.

Further Advice or Assistance

Further advice and information can be obtained from the:

» 123 Support Services Director:

- by phoning: 07 4361 6848;
- by emailing: admin@123supports.com

Effectiveness and Review

The Director will review this Policy and Procedures document each 12 months on the anniversary of its approval.