



Policy	Conflict of Interest
Applicability	Bower Place
Authorisation	General Manager / Directors
Policy Endorsement Date	1st April 2019
Policy Review Date	22 nd June 2021 October 2020
Next Policy Review Date	June 2022
Document version	V1.2 Final
Policy Owner	Directors

Purpose

The objective of this policy is to ensure that actual, potential, and perceived conflicts of interest are identified and managed effectively at Bower Place.

Scope

The principles and procedures in this Policy apply to all Bower Place employees and to all people who engage with Bower Place in a training capacity including:

- All Bower Place training participants
- Masters' students on placement
- TAFE SA students
- Any other training participants undertaking professional development training at Bower Place.

Policy Statement

Bower Place is committed to ensuring that conflicts of interest are identified and managed so that they do not affect the services, activities, or decisions of the organisation.

Bower Place employees and any training participants are required to identify and declare all conflicts of interest, implement, and monitor action to appropriately manage the conflict when applicable.

**Your (place) for
positive change.**



Any conflict of interest must be reported immediately to Bower Place Management staff. If a management staff member is not available, the report must be made to another Bower Place staff member for the conflict to be assessed, or to the training facilitator.

Bower Place require any conflict of interest to be reported. Interests may be deemed as:

- Work interests: The interests of Bower Place Pty Ltd. in pursuit of its mission and objectives.
- Private interests: Personal, professional, or business interests including those of individuals, groups, or organisations that workers associate with outside of Bower Place Pty Ltd.
- Non-pecuniary interest: A private interest without a financial component where there may be a tendency for favouritism or prejudice to arise due to friendship, animosity or other personal involvement with another person or group.
- Conflict of interests: A clash between a worker's private interests and work interests that gives, or may give or be perceived to give, advantage to the worker or to others who are associated with the worker.
- Conflict of duties: A competing interest between an official duty for one entity and the official duty of another.

Roles & Responsibilities

Everyone at Bower Place is responsible for identifying, disclosing, and resolving conflicts of interest. Bower Place continually retains awareness of reporting conflicts of interest, to ensure potential conflicts are disclosed and resolved.

Bower Place employees and/or training participants (as noted above) are to retain awareness of potential conflicts of interest that might affect them and avoid them where possible. Any conflicts of interest are to be promptly identified and disclosed, whether any actual or potential conflicts of interest that might be perceived to affect the proper performance of their work.

If a Bower Place employee and/or training participant (as noted above) becomes aware that there may be a conflict of interest, they must report that fact to a supervisor. Reporting a conflict allows Bower Place management to resolve it.

It is important to note that a conflict may be actual, perceived or a potential and it may be pecuniary or non-pecuniary. If not managed properly, either kind can be equally damaging to our own and our organisation's reputation.

In the event that an actual conflict of interest is determined, the employee and/or training participant (as noted above) is to be immediately removed from the relevant case. The Bower Place employee and/or training participant is to have no further contact with or participation in any aspect of the case. This includes access to information and documents or confidential information.

An independent third-party person (manager) is to make any final decision and if a conflict of interest is present, they are to remove the person with the conflict from the process. Such person is therefore required to be instructed that are to abstain from any formal or informal discussion or actions about the relevant matter.

When required Bower Place are to ensure under these circumstances to transfer the person to another area of business, case team or provide alternative duties for the relevant period of time.

All conflicts of interest must be registered in the Conflicts of Interests Register. This Register is kept by the Practice Manager at Bower Place and helps to show that the conflict has been declared and resolved. It adds transparency to the situation.

Conflict of Interest and Support Options for clients

Bower Place policy is to use Bower Place protocol to ensure clients are provided with and explained in detail using language, mode of communication and terms that clients are most likely to understand, promoting choice and control, in all matters pertaining to support options.

Clients are to be provided with details to understand the distinction between the provision of specialised support coordination and other reasonable and necessary supports funded under the client's plan; utilising Bower Place protocols.

If clients are accessing therapeutic services, outreach services and Support Coordination services, it is essential that all clients are provided with a minimum of three options for alternative providers that offer similar support.

At all times it remains the client's choice to make which services that wish to access, and it is Bower Place policy to ensure any choice that is made by the client, will not impact on the provision of specialised support services.

All referrals to other providers must be made in writing and documented to be stored in individual client files.