

Conflict of Interest Policy and Procedure

Purpose and Scope

The purpose of this policy and procedure is to set out how HomeMade manages conflicts of interest in an open and transparent manner. It applies to all employees and contractors ('staff') and meets relevant legislation, regulations and Standards as set out in Schedule 1, Legislative References.

Applicable Aged Care Quality Standards

- *Standard 7. Human Resources*
- *Standard 8. Organisational Governance*

Definitions

Conflict of Interest – A situation where a person can derive a real or perceived benefit from actions or decisions made in their official capacity, where their decision is affected by relationships. These relationships can be because of family, friends or other positions they hold (for example, sitting on Boards). A conflict of interest can also occur when an employee's personal interests, or the interests of their family or friends, may interfere with their ability to act in the best interests of HomeMade or our clients.

Policy

HomeMade acts with integrity, honesty and transparency and supports consumers' choice and control. This includes disclosing any conflicts of interest – perceived or actual – that may impact how it delivers support.

Procedures

General

All staff should avoid involving themselves in matters that conflict with their duties to HomeMade and the consumers they support. Staff must not accept any money, gifts, benefits or commissions that could interfere with their ability or willingness to act in consumers' best interests. Nor must they take advantage of their position to directly or indirectly gain a personal benefit or a benefit for another person or body.

When making decisions, staff should consider:

- whether they have any personal or private interests in a matter that may conflict or be perceived to conflict with their duties;
- whether there could be a benefit for them, their family or their friends into the future if they are involved in a particular matter;
- how their involvement may be viewed by others; and
- whether their involvement in a decision being made appears fair and reasonable.

When staff or their Family/Friends are users of the HomeMade or Mable Platform

It is crucial that our employees, who play a significant role in delivering our services, act in the best interests of our clients and the organisation. To ensure that potential conflicts of interest do not compromise our values or the quality of our services, employees that are users or have family/friends that engage HomeMade or Mable Platform should under no circumstances:

- Review or take action on their profile using HomeMade or Mable credentials
- Review or take action on their family/friends profile using HomeMade or Mable credentials

Staff who are uncertain about whether a conflict of interest exists should seek advice from a representative of the People team or a member of the Senior Leadership Team before proceeding.

Disclosure

Staff must declare conflict of interest to their direct managers, as soon as practicable after they become aware of it. This includes actual, potential and perceived conflicts of interest. Their direct manager may consult with their line

management as required.

Once a discussion is held with the line manager, record the Conflict of Interest using the [HomeMade Declaration of Conflict of Interest form](#), outlining the nature of the conflict and strategies to resolve or mitigate risk.

If the conflict of interest relates to being a user or having family/friends that engage with the Mable or HomeMade Platform please complete Section 1 and Section 2 of the form.

If circumstances change, a new Declaration of Conflict of Interest form should be completed with current information.

Conflict Assessment

Upon receiving the disclosure of the conflicts of interest, the People team will be in contact with the HomeMade's Senior Leadership Team to conduct an assessment to determine if a conflict of interest exists. The assessment will consider factors such as the nature of conflict, the employee's role within HomeMade, and the potential impact on the organisation's interests and reputation.

Depending on the outcome of the conflict assessment, HomeMade may take actions to mitigate or resolve the conflict.

Where an employee or their family are permitted to engage HomeMade as a customer, they must provide regular updates regarding the nature and extent of their engagement. This information will be monitored to ensure ongoing compliance with the policy.

Compliance

Failure to comply with the Conflict of Interest Policy, may result in disciplinary action, up to and including termination of employment.

Supporting Documents

Documents relevant to this policy and procedure include:

- [HomeMade Declaration of Conflict of Interest](#)

Monitoring and Review

This policy and procedure will be reviewed at least annually by the Senior Leadership Team. Reviews will incorporate staff, consumer and other stakeholder feedback, where relevant.

Annual satisfaction surveys will assess consumer and staff satisfaction with HomeMade's conflict of interest processes and provide stakeholders with the opportunity to provide feedback on areas for improvement.

HomeMade's *Continuous Improvement Register* will be used to record improvements identified and monitor the progress of their implementation. Where relevant, this information will be considered as part of HomeMade's service planning and delivery processes.

Document History

Version No.	Issue Date	Document Owner
2	October 2023	Senior Leadership Team
1	March 2020	Senior Leadership Team
Version History		
Version No.	Review Date	Revision Description
1	March 2020	Implementing Policy and Procedures for Aged Care Services