

Conflict of Interest Policy

The Little Sanctuary Support Services PTY LTD

The Little Sanctuary Support Services Pty Ltd (“the Organisation”) is committed to providing a safe, respectful, and inclusive environment for all participants, families, carers, staff, and volunteers.

1. Purpose

The purpose of this policy is to ensure that all employees, contractors, and stakeholders of The Little Sanctuary Support Services PTY LTD:

- Operate with integrity and transparency, avoiding conflicts of interest that may compromise the ethical and legal responsibilities required under the National Disability Insurance Scheme (NDIS) Code of Conduct, the Public Sector Ethics Act 1994, Human Rights Act 2019, Information Privacy Act 2009, Public Interest Disclosure Act 2010.
- Minimise impacts of Conflicts of Interest such as reputational damage, financial consequences, legal compliance, decision making bias, workplace tension, ethical dilemmas, and service quality.
- Manage conflicts proactively through disclosure, transparency, and strong internal policies.

2. Scope and applicability

This policy applies to all employees, contractors, volunteers, and board members of The Little Sanctuary Support Services PTY LTD involved in service delivery and administration.

3. Definition of Conflict of Interest

A conflict of interest occurs when personal, financial, or other interests influence, or appear to influence, an individual’s decisions in ways that could negatively impact service delivery or the rights of participants and children.

4. Types of Conflict of Interest

Conflicts of interest may arise in various situations, including but not limited to:

- Personal Relationships: Providing services to a family member or close friend.
- Financial Interests: Holding financial stakes in a company that supplies goods or services to the business.
- Employment or External Activities: Engaging in work outside of The Little Sanctuary Support Services PTY LTD that conflicts with professional duties.
- Gifts and Incentives: Accepting gifts or incentives that could influence professional decisions.

5. Managing Conflicts of Interest

To ensure compliance with NDIS guidelines:

- Disclosure: All personnel must disclose actual, potential, or perceived conflicts of interest immediately upon identification. Personnel will complete the online training [Conflicts of Interest Module](#) and then complete the Disclosure of *Conflict of Interest form* and submit to their manager.

This information will be entered into the *Conflict of Interest Register*. The *Conflict of Interest Register* must be maintained by Elizabeth Spash, Secretary/Director of The Little Sanctuary Support Services. The register must record information related to a conflict of interest (including the nature and extent of the conflict of interest and any steps taken to address it using the *Risk Assessment Matrix for Conflict of Interest*).

- Assessment and Resolution: Management will assess disclosed conflicts and determine appropriate action, including restrictions or recusal from decision-making.

In deciding what approach to take, the Director will consider:

- whether the conflict needs to be avoided or simply documented
- whether the conflict will realistically impair the disclosing person's capacity to impartially provide services to the client or make decisions regarding the company
- alternative options to avoid the conflict, and
- the possibility of creating an appearance of improper conduct that might impair confidence in, or the reputation of, The Little Sanctuary Support Services PTY LTD.

- Transparency in Decision-Making: All decisions should be made impartially and in the best interests of service users.

- Ongoing Monitoring: Regular audits and reviews will be conducted to identify and mitigate conflicts of interest.

6. Compliance

This policy aligns with:

- NDIS Code of Conduct, ensuring ethical, safe, and professional service delivery.

- Privacy and Confidentiality Obligations, upholding the rights of participants and safeguarding sensitive information.

- Psychology Board of Australia's Code of Conduct for psychologists.

7. Consequences of Non-Compliance

Failure to disclose or appropriately manage conflicts of interest may result in disciplinary actions, including termination of employment or contractual agreements, and potential legal consequences.



8. Review and Updates

This policy will be reviewed annually or as required to comply with changes to NDIS regulations.

9. Acknowledgement

All employees, contractors, and stakeholders must read and acknowledge this policy. Signed declarations may be required upon employment and during periodic policy reviews.

Amended by: Elizabeth Spash *Director of The Little Sanctuary Support Services PTY LTD*

Date: 13th September 2025

To be reviewed: 13th September 2026

Relevant Policies and Supplementary Resources:
Code of Conduct V1 May 2025
Conflict of Interest Disclosure Form V1 May 2025
Risk Assessment Matrix for Conflict of Interest V1 May 2025
Conflict of Interest Register V1 May 2025