

1.02 Conflict of Interest Policy & Procedure

Purpose

The purpose of this policy and procedure is to demonstrate Alacrity Health's commitment to managing conflicts of interest, including in regarding to referring to the business' own services and delivering services for participants in a transparent manner.

Who is covered by this policy?

This policy and procedure applies to all Alacrity Health staff, contractors and volunteers.

Policy

I FUKAROVA & H.L HEATHERINGTON T/A Alacrity Health (ACN 151 101 739) (**we, us or our**), actively record and manage conflicts of interest that may arise while we provide our services to you. When assessing conflicts of interest we take into account the personal and financial interests of our shareholders, directors and employees (**Personnel**) to ensure we always provide services that are in the best interests of our participants.

If you cannot understand this Conflict of Interest Policy, you can contact us and we will explain the policy using your preferred method of communication.

What is a conflict of interest?

There are different types of conflicts of interest such as:

- **Personal conflicts of interest:** where one of our Personnel has an interest (or one of their family members or close friends has an interest) which can influence how they deliver services to our participants or where they can be influenced when providing the services to our participants.
- **Financial conflicts of interest:** where we or our Personnel have a financial interest which can influence or affect the services that we deliver to our participants.
- **Conflict of duties:** where the duties of our Personnel are not aligned with the duties they owe to our participant or to another company.

Conflicts of interest can be:

- **Real:** a real conflict of interest arises when the conflict of interest actually exists – which means the conflict of interest has been identified and confirmed.
- **Potential:** a potential conflict arises when there is a situation which may at some time in the future impact on the services we deliver to our participants.
- **Perceived:** a perceived conflict is when you, or a third party, may believe that our interests, or those of our Personnel are in conflict with your interests (even if no such conflict actually exists).

Conflicts of interest can occur naturally and are not an indication that either we or our Personnel are acting improperly. All types of conflicts of interest must be actively managed to ensure you receive services which are appropriate for you.

Procedure

How we manage conflicts of interest generally

We have processes in place for our Personnel to declare any conflicts of interest and to record and manage all disclosed conflicts of interest. In delivering our services we will ensure that:

- a) we avoid participating in sharp practices;
- b) we declare and proactively manage all perceived, potential or real conflicts;
- c) we provide you with transparent and factual information and advice about which supports are best suited to your needs;
- d) you receive services from Personnel who have the skills to assist you;
- e) there is no preferential treatment given to any participant;
- f) our Personnel do not seek or receive any benefit from a participant;
- g) your complaints are taken seriously; and
- h) if you are concerned about any conflicts of interest, that you can terminate or modify your services at any time.

We have internal management policies in place to ensure:

- a) that all conflicts of interest are documented, recorded and managed;
- b) we explain all perceived, potential or real conflicts of interest to you in your preferred mode of communication and in a way that you understand;
- c) all participants are treated fairly and according to their needs; and
- d) all gifts received or offered by participants to our Personnel are appropriately recorded and documented.

Where we are recommending services that we are not directly delivering to you:

- a) we will immediately disclose and explain if we, or our Personnel, have an interest in the services, or provider of the services, that we recommend; and
- b) we will, where possible, provide you with three recommendations for any services or supports we recommend.

Our conflicts of interest

We provide general disability services and support coordination services. If you are receiving general disability services and support coordination services from us, this creates a potential conflict of interest.

We will manage this conflict of interest by:

- a) not doing any acts to influence you to choose us to provide you with more than one service;
- b) making sure each service is covered by a separate service agreement which can be terminated without impacting on the other services;
- c) making sure we explain to you, your right to choose and control your service providers and that your decision to use another service provider will not impact on any services that you received from us;
- d) where we act as your support coordinator, we will ensure that all your records are kept separate and that only our Personnel who provide support coordination services access those records;
- e) where we act as your support coordinator, we will make sure that we recommend potential service providers that may meet your needs and we will not influence your choice and control; and
- f) ensuring that our Personnel are trained in the management and disclosure of conflicts of interest.

Your conflicts of interest

You must let us know if there are any conflicts of interest when you are receiving the service, such as you having a personal relationship with any of our Personnel.

If you have any questions about how we manage conflicts of interests or would like more information, please contact us at:

Alacrity Health (ACN 151 101 739)

Email: admin@alacrityhealth.com.au

Phone: (03) 9056 9191

Last update: 2nd January 2025