

Conflict of Interest Policy

Purpose

This policy outlines the expectations for Local Guardians and its team in identifying, disclosing and managing any actual, potential or perceived conflicts that could impact the delivery of high-quality and safe care and support services to our clients, as well as the activities or decisions of the organisation.

The existence of a conflict of interest in relation to Local Guardians' activities does not necessarily mean that the activity may not occur. While in some instances the only way in which a conflict can be managed appropriately is for the circumstances giving rise to it to be avoided completely, in other situations it will be possible to manage the conflict in such a way that the interests of all parties can be appropriately addressed.

All conflict management decisions must prioritise the best interests, safety, and quality of care of the client.

This Policy applies to all directors, officers, employees, contractors and volunteers of Local Guardians, and any person acting on behalf of the organisation.

Policy Statement

Disclosure of Conflicts

All persons must promptly (no later than 3 business days) disclose any actual, perceived, or potential conflict of interest, and update any disclosure where circumstances change.

Conflicts of interest must be disclosed to the appropriate level of management:

- Employees and contractors must disclose conflicts to their direct manager
- Managers must disclose conflicts to the CEO
- The CEO must disclose conflicts to the Board Chair

Directors must disclose conflicts in accordance with Local Guardians' governance requirements and maintained in the Conflict of Interest Register by the Chair of the Board.

Managing Conflicts

Where a conflict is identified, the CEO will determine appropriate management strategies, including:

- Removing the individual from decision-making

- Implementing independent review or oversight
- Restricting access to information
- Declining or terminating the arrangement

In the event of a suspected conflict of interest, a documented decision will be made by the CEO after a full review of the circumstances, legal or other advice on the matter, the potential consequences of both continuing and discontinuing the matter and the options available for management of the conflict.

All actions must prioritise the best interests of the client.

Conflicts Involving Related Parties

The Local Guardians service model requires Related Parties to provide “in-kind” services to support a client without remuneration. Any payment to Related Parties is inconsistent with this model and may create conflicts of interest that are not in the client’s best interests.

Related Parties should not have any self-motivated, direct or indirect financial payment from a client’s home care package.

Gifts and Benefits

The acceptance or provision of gifts, benefits, or hospitality must not influence, or be perceived to influence, decision-making or the delivery of services:

- Gifts or benefits must not influence, or be perceived to influence, decision-making
- Any gifts or benefits must be declared in accordance with organisational procedures.
- Gifts of significant value, ie over \$200, must not be accepted without CEO approval.
- Nominal gifts such as chocolates or flowers are acceptable

Definitions

Related Party	Any individual or entity that has a close personal, professional, or financial relationship with Local Guardians, a client, or a staff member, and whose involvement could give rise to an actual, perceived, or potential conflict of interest. Includes: Board Members, Staff, Contractors, Service Provider Organisations / Service Provider Staff , Client family members, including spouses, de facto spouses, parents and children.
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Conflict of interest	When the personal, financial, professional or other interests of a person could influence, or be perceived to influence, the performance of their duties or the decisions they make on behalf of the client or the organisation. Conflicts of interest may be: Actual: where a direct conflict currently exists. Potential: where a conflict could arise in the future. Perceived: where it may appear to others that a person's judgment could be influenced. Conflicts may arise in situations including, but not limited to: • Financial interests in suppliers or service providers • Personal relationships with clients or their families • External employment or directorships • Acceptance of gifts, benefits, or hospitality • Involvement in procurement or referral decisions Local Guardians team members must ensure they do not act outside their scope of practice, including making themselves representatives for the client, e.g. in My Aged Care.
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Version History

Version number	Summary of change	Approved by	Effective date
1	Creation of policy to ensure that all conflicts of interest are managed.	Board	13-Aug-2024
2	Updated to include additional wording around disclosure and other changes.	Board	29 March 2026