

# Waylight Pty Ltd

## Waylight Plan Management

<b>Document Title</b>	Conflict of Interest Policy
<b>Document Number</b>	WL-POL-03
<b>Version</b>	1.0
<b>Date</b>	2026-04-02
<b>Review Date</b>	2027-04-02
<b>Approved By</b>	Joshua, Director
<b>Classification</b>	Internal

### 1. Purpose

This policy establishes Waylight's framework for identifying, declaring, and managing conflicts of interest in the delivery of NDIS plan management services. As a plan manager, Waylight is a financial intermediary responsible for processing invoices and lodging claims on behalf of participants. Any conflict of interest, actual, potential, or perceived, that could influence these financial decisions must be declared and managed transparently.

### 2. Scope

This policy applies to all workers, contractors, and volunteers engaged by Waylight Pty Ltd in the delivery of plan management services. This includes the Director (Joshua), the Contractor-Accountant, and any future plan management workers.

### 3. Applicable Standards

- NDIS Practice Standards. Governance and Operational Management: 'Perceived and actual conflicts of interest are proactively managed and documented, including through development and maintenance of organisational policies.'
- NDIS Code of Conduct, Element 4: 'Act with integrity, honesty and transparency.' Providers must 'disclose to the people with disability they support any conflicts of interest, potential or real, that may impact on how they deliver supports and services.'
- NDIS Code of Conduct. Provider Guidance (paragraphs 57-60): NDIS providers should not allow any financial or commercial interest to adversely affect the way they engage with people with disability. Internal policies for declaring and avoiding conflicts must be maintained.

### 4. Policy Statement

- Waylight proactively identifies, declares, and manages all conflicts of interest, actual, potential, and perceived.

- All workers and contractors complete an annual conflict of interest declaration and update it whenever circumstances change.
- No person with a declared conflict processes invoices, lodges claims, or makes financial decisions relating to that conflict without independent review.
- Participants are informed of any conflict of interest that could affect their plan management services.
- Waylight does not accept inducements, gifts of more than minor value, or referral fees from service providers.

## **5. Procedure**

### **5.1 Declared Conflicts. Current**

- Conflict 1. Director's Secondary Employment: Joshua (Director) is currently employed as an NDIS support worker with another provider. This creates a conflict where Joshua may process invoices from his employer or colleagues. Management: Joshua does not process invoices from his current employer or any provider where he has a personal or employment relationship without documenting the conflict and having the Contractor-Accountant independently review and approve the claim. If the Contractor-Accountant identifies a concern, the claim is not lodged until resolved.
- All current conflicts are recorded in the Conflict of Interest Register, maintained by the Director and accessible to the Contractor-Accountant.

### **5.2 Declaration Process**

- Step 1: On commencement, every worker and contractor completes a Conflict of Interest Declaration form listing all actual, potential, and perceived conflicts.
- Step 2: Declarations are reviewed annually. The Director reviews contractor and worker declarations. The Contractor-Accountant reviews the Director's declaration.
- Step 3: If circumstances change during the year (new employment, new business relationship, family member becomes a service provider), the person updates their declaration within 5 business days.
- Step 4: All declarations are stored in the Conflict of Interest Register and retained for 7 years.

### **5.3 Management Strategies**

- Recusal: The conflicted person does not participate in decisions related to the conflict. Another authorised person (the Contractor-Accountant or the Director) handles the matter.
- Independent Review: Where recusal is not practical (e.g., sole operator processing a claim), the Contractor-Accountant independently reviews the transaction and documents their approval.

- Transparency: The participant is informed of the conflict and how it is being managed. The participant can request that a different person handle their matter.
- Restriction: If a conflict cannot be managed through recusal, review, or transparency, Waylight declines to provide plan management to the affected participant and assists with transition to another plan manager.

## 5.4 Gifts and Inducements

- No worker or contractor accepts gifts of more than minor value (above \$50) from service providers, participants, or their families.
- No worker or contractor accepts referral fees, commissions, or inducements from service providers.
- Any offer of a gift or inducement is documented in the Conflict of Interest Register, regardless of whether it was accepted or declined.

## 6. Responsibilities

Role	Responsibility
Director (Joshua)	Maintains the Conflict of Interest Register. Completes annual declaration. Declares new conflicts within 5 business days. Applies management strategies. Informs affected participants.
Contractor-Accountant	Reviews the Director's declaration. Provides independent review of transactions where the Director has a conflict. Completes own annual declaration.
Plan Management Worker (future)	Completes annual declaration and updates as needed. Reports conflicts immediately.
Participants	Are informed of any conflicts affecting their services. Can request alternative handling arrangements.

## 7. Related Documents

- WL-POL-01 Financial Management Policy & Procedure
- WL-POL-02 Fraud Prevention & Detection Policy
- WL-POL-06 Governance & Operational Management Policy
- NDIS Code of Conduct
- Conflict of Interest Declaration Form (internal)
- Conflict of Interest Register (internal)

## 8. Audit Readiness Notes

- Q: 'You currently work as a support worker. How do you manage that conflict of interest?'.  
A: It is declared in the Conflict of Interest Register. I do not process invoices from my employer or any provider where I have a personal relationship without independent review by the Contractor-Accountant. If a participant's provider is connected to me, I disclose this to the participant.
- Q: 'How do you handle a situation where a provider you know personally submits an invoice?'. A: Declare the conflict. The Contractor-Accountant independently reviews and approves the claim. The participant is informed. If the conflict is too significant to manage, I assist the participant to transition to another plan manager.
- Q: 'Do you accept referral fees from providers?'. A: No. Waylight does not accept referral fees, commissions, or inducements. Any offer is documented in the register regardless of whether it was accepted.

## 9. Review

This policy is reviewed annually or earlier if there are changes to NDIS legislation, Practice Standards, or organisational operations. Next scheduled review: 2027-04-02.

## Version History

Version	Date	Author	Changes
1.0	2026-04-02	Joshua	Initial version