

REGENERATE HEALTH CONFLICT OF INTEREST POLICY

1. Introduction

1.1. Regenerate Health is committed to delivering the best possible outcomes for those receiving our services. Regenerate Health values openness and promotes transparency in processes, procedures and decision-making and emphasises consistency, fairness and probity as integral to our relationships, individual and collective, with all stakeholders. Regenerate Health team members or representatives should avoid ethical, legal, financial, personal relationships or other conflicts of interest, and ensure that their activities and interests do not conflict with their obligations to the organisation.

1.2. Regenerate Health recognises that a well-established system for identifying, disclosing and managing conflicts of interest increases its public accountability and reduces the risk of corruption, misconduct and bias in its operations and decision-making processes. Regenerate Health also recognises that conflicts of interest are not unusual in the exercise of public responsibility and cannot always be avoided.

1.3. Conflicts of interest are not wrong in themselves, cannot always be avoided, and the potential for a conflict of interest exists in all aspects of Regenerate Health's operations, including assessment, staffing, administration, and commercial activity. Conflicts may be actual, potential or perceived by others. With increasing links between Regenerate Health and other organisations, companies and institutions, it is important that Regenerate Health act and are seen to act with integrity and are not inappropriately benefited by improperly using their position.

2. Application

The guideline applies to all Regenerate Health employees (and sub-contractors).

3. Purpose

The purpose of the guideline is to ensure that all employees (and sub-contractors) can:

- a) Identify perceived, potential and actual conflicts of interest, and
- b) Appropriately manage those conflicts.

4. Related Legislation and Standards

4.1. SIRA NSW Code of Conduct for Workplace Rehabilitation Providers. The Code of Conduct outlines a range of guidelines with which we must comply. Those guidelines include but are not limited to:

- Ethical and professional behaviour
- The model of public duty
- The acceptance of gifts, bribes and benefits
- Maintenance of professional competence
- Secondary employment
- Discrimination
- Political participation
- Declaration and management of conflicts of interest

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SIRA NSW monitors and, in response to any complaint, may investigate Regenerate Health's compliance with the Code of Conduct, including how we manage conflicts of interest. Failure to manage conflicts of interest is a breach of the Conditions of Approval and will prompt SIRA NSW to act in accordance with its powers as outlined in the Code of Conduct.

5. What is a Conflict of Interest?

5.1.A conflict of interest exists when:

- Our behaviour is likely to be influenced by a personal interest in performing our roles, and;
- It may be perceived that our behaviour could have been influenced by a personal interest in performing our roles

A conflict of interest can arise from avoiding personal losses as well as gaining personal advantage, be it financial or otherwise.

Basically, a conflict of interest may arise when, due to external and/or internal influences, you cannot or do not act fairly, with integrity and honesty.

5.2 Personal Interest: A personal interest is one that can bring benefit or disadvantage to you, and/or to others whom you may wish to benefit or disadvantage.

A personal interest includes:

- Your personal, professional or business interests, and
- The personal, professional or business interests of individuals or groups with whom you may associate, including relatives, friends or even rivals and enemies.

Personal interests can either be "pecuniary" or "non-pecuniary".

5.3.Pecuniary and Non-Pecuniary Interests

5.3.1. *Pecuniary interests*

An interest that you may have in a matter because of the likelihood or expectation of financial gain or loss to yourself or to another person with whom you associate (e.g., a relative, friend, partner or colleague).

5.3.2. *Non-pecuniary interests*

Any private interest, which does not relate to money. For instance: kinship, friendship, membership of an association, society or trade union or involvement in an activity.

5.4Conflicts of Interest may be actual, perceived or potential

5.4.1 *Actual Conflict of Interest*

Occurs when a direct conflict exists between your role and existing personal interests.

5.4.2 *Perceived Conflict of Interest*

Occurs when it appears that your personal interests could improperly influence you in performing your role, whether that is true.

5.4.3 *Potential Conflict of Interest*

Occurs when you have personal interests that could conflict with your role in the future.

5.5. Competing Interests: Conflicts of interest can also arise if you have roles in more than one organisation.

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For example, sub-contractors who deliver services on behalf of more than one service provider could exchange information that (dis)advantages one or more of those organisations.

These situations are known as competing interests and can give rise to a conflict of duty. They should be managed in the same manner as any conflict of interest.

6. Responsibilities

6.1 Management

The Director & General Manager are responsible for ensuring that:

- a) This guideline is distributed to all Regenerate Health personnel, including subcontractors
- b) Suitable instruction, training and supervision is provided to support those personnel managing conflicts of interest
- c) Information concerning conflicts of interest is routinely disseminated through team meetings, peer review, e-alerts and other suitable media
- d) Assessing and managing conflicts of interest
- e) Referring matters to suitably credentialed third parties or regulatory bodies when indicated
- f) Maintaining a Register of Conflicts of Interest, including records on how such conflicts have been managed
- g) Reviewing the currency and utility of the guidelines in consultation with members of the Regenerate Health team.

6.2 Employees and subcontractors

All Regenerate Health personnel have a responsibility to:

- a) Declare any actual or potential conflict of interest to the Managing Director and/or Operations Manager, and
- b) Participate in the management of conflicts of interest in accordance with this guideline.

6.3 Does a Conflict of Interest exist?

Ask yourself the following questions to determine if an actual, potential or perceived conflict of interest exists:

1. Do I, a relative, friend or associate stand to gain/lose financially?
2. Do I, a relative, friend or associate stand to gain/lose in any way?
3. Have I made any promises or commitments in relation to the matter?
4. Have I received a benefit or hospitality from someone who stands to lose or gain from my decisions/actions?
5. Am I a member of an association, club or professional organisation, or do I have particular ties and affiliations with organisations or individuals, who stand to lose or gain?
6. Could there be benefits for me in the future that could cast doubt on my integrity?

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7. If I act in this matter, would I be happy for my colleagues and the public to be aware of any association or connection?

8. Would a third person reasonably perceive that I was influenced by personal interest in performing my role?

9. Am I confident of my ability to act impartially and in the public interest?

7. Declaring a conflict of interest

You must declare any actual, potential or perceived conflict of interest (pecuniary or non-pecuniary).

Disclosure must be made at the first available opportunity to (i) expedite decision making and (ii) control any risks to our customers, our clients, you, and our business.

8. Reporting your own conflict of interest

- Refrain from making decisions or acting on the matter independently.
- Refrain from discussing the conflict with the customer or client.
- Disclose the conflict of interest to the Managing Director and/or General Manager.

9. Reporting conflicts of interest involving other Regenerate Health personnel

You have an obligation to report conflicts of interest that have the potential to bring Regenerate Health into disrepute.

If you are aware of a conflict of interest involving an employee or sub-contractor, you must report the matter to the Director and/or General Manager.

10. Managing conflict of interest

The ultimately responsibility for assessing and managing a conflict of interest rests with the Director.

If required, the Director may refer the matter to a suitably credentialed third party or to the relevant regulator (e.g., SIRA) to facilitate decision-making. Doing so would control the influence, whether actual or perceived, of the person with the conflict.

You should not participate in the decision making concerning a conflict of interest, especially if it relates to yourself or someone with whom you have a close personal relationship.

11. Failure to declare conflict of interest

If you do not declare a conflict of interest and it is revealed that the integrity of

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your decisions and actions has been affected, and/or you have received financial gain, the following courses of action may be taken.

- Performance review and development planning
- Possible dismissal or termination of contract

12. Conflict of Interest Register

12.1. A Conflict of Interest Register is to be established and maintained by the General Manager. Each conflict of interest that is declared, whether actual, potential or perceived, must be recorded in the Conflict of Interest Register.

12.2. Decisions and actions concerning the management of the conflict of interest must also be recorded in the Conflict of Interest Register. The Director may direct the (or other suitable delegate who is not a party to the conflict) to enter all records in the Register. The Register is to contain the following information:

- Name of the person declaring the conflict of interest;
- To whom was the conflict declared;
- Date of declaration;
- A description of the matter;
- Organisation(s) or people involved;
- Decisions made and action taken to manage the conflict

Cross Referencing & Further Reading

Code of Conduct for Workplace Rehabilitation Providers

Regenerate Health Privacy Policy and Data Breach Response Plan

Regenerate Health Malpractice & Fraud Policy

13. Document Control and Revision History

Schedule for Revision of Policy: Conflict of Interest Policy - Version 1.4			
Date Adopted/Reviewed	Outcome	Author	Next Review
May 2013	New policy	C. Walker	May 2014
October 2021	Updated policy for new framework	K. Traverse	October 2022
24/09/2025	Reviewed and updated	Carolyn Bell	24/09/2026
29/11/2025	Reviewed and updated	Carolyn Bell	29/11/2026

¹ That is unless the Managing Director/General Manager is the person with the pecuniary interest. In such circumstances, the Managing Director must refer the matter to an independent third party (i.e., a suitably credentialed person or the relevant regulator).

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Appendix 1

1. Systems to Avoid Conflict of Interest with Regenerate Health RTW Coordinator Services

Regenerate Health provides a range of workplace health services specifically developed to provide cost and time effective health promotion and injury management/prevention tools. Regenerate Health employees have been appointed to RTW Coordinator roles with external organisations to assist with implementing RTW programs, supporting workers as they recover at work and to ensure employers meet their legal obligations as per the workers compensation framework.

Regenerate Health maintains that any perceived conflict of interest arising from what is deemed as direct referral will be minimised by way of the following actions:

- 1.1. The RTW Coordinator will ensure that evidence-based practices will be utilised in bringing about the rationale for referral for workplace rehabilitation services. These will include but will not be limited to accompanying standardised assessment tools (i.e., OMPQ) and associated functional assessment tools and questionnaires.
- 1.2. The RTW Coordinator will then discuss the nature of the service and the purpose of the referral with the agent and the worker. The agent and the worker will be advised that Regenerate Health is able to provide this service; however, the worker has the right to select their own service provider.
- 1.3. If a referral for workplace rehabilitation services is agreed upon, either the worker or agent will initiate a referral to Regenerate Health.
- 1.4. The Rehabilitation Consultant will then seek choice selection from the worker prior to presenting the initial assessment request to the agent for approval.
- 1.5. Regenerate Health will undertake evidence-based assessments to determine the workers' suitability for workplace rehabilitation services and the scope of service provision.
- 1.6. Upon receipt of a referral, Regenerate Health will gain the workers signed consent at all times and ensure the worker is issued with Regenerate Health's Privacy Policy upon commencement of service provision. It explains how the information pertaining to their personal and health records is collected, held, used and disclosed.
- 1.7. Regenerate Health's Privacy Policy also provides injured workers with direction pertaining to the management of health care information. The relevant Acts, being the Privacy Act 1988 and the Health Records and Information Privacy Act 2002.
- 1.8. If information is shared between the RTW Coordinator and Regenerate Health's Rehabilitation Consultant, it will be in the spirit of return to work only.
- 1.9. In the event of a Case Conference with a Nominated Treating Doctor or IMC, everyone in attendance represents one stakeholder and the RTW Coordinator and Regenerate Health Rehabilitation Consultant ensure clear division of responsibility in their respective roles at the Case Conference.
- 1.10. If a worker or other relevant stakeholder makes a complaint against Regenerate Health in relation to a perceived conflict of interest, malpractice or fraud matter, Regenerate Health may seek support and advice from a representative of the Health Care Complaints Commission and / or

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professional association when investigating the complaint. For serious matters, Regenerate Health will also appoint an Independent Auditor to review the matter and liaise with the complainant and/or relevant stakeholders. Regenerate Health will handover the communication process to the Independent Auditor and the Health Care Complaints Commission for investigation and reporting. At the time of writing, Regenerate Health's designated independent representative is Mr Jamie Travis. Mr Jamie Travis is an independent SIRA, Workplace Injury Management Branch Approved Audit.

Appendix 2

1. Conflict of Interest with Regenerate Health's Psychological Services

Regenerate Health provides psychological services to injured workers who have sustained a psychological injury because of their employment or psychological issues secondary to physical injuries. Additionally, Regenerate Health also provide critical incident responses and Employee Assistance Programs to employers and their employees outside of the workers' insurance scheme.

Regenerate Health's psychological services include the following:

1. Psychological Assessment
2. Psychological Counselling
3. Employee Assistance Programs
4. Critical Incident Debriefing

Regenerate Health maintains that any perceived conflict of interest arising from what is deemed as an internal referral will be minimised by way of the following actions:

- 1.1. The Psychologist/Rehabilitation Consultant will ensure that evidence-based practices will be utilised in bringing about the rationale for referral for all services. These will include but will not be limited to accompanying testing tools such as OMPQ, DASS and associated functional assessment tools and questionnaires.
- 1.2. The Psychologist/Rehabilitation Consultant will then discuss the nature of the service and the purpose of the referral with the worker. The worker will be advised that Regenerate Health is able to provide this service however, they have the right to select their own service provider.
- 1.3. The Psychologist/Rehabilitation Consultant will then seek choice selection from the worker prior to presenting the initial assessment request to the agent for approval.
- 1.4. In the event that the worker, the agent and Nominated Treating Doctor support the referral then the worker will be informed that a Psychologist/Rehabilitation Consultant from Regenerate Health will perform an Initial assessment to determine their suitability for psychological interventions / Counselling.
- 1.5. Regenerate Health maintains a separate electronic file for each service to ensure privacy and confidentiality of information pertaining to the psychological program / intervention.
- 1.6. Regenerate Health will establish and maintain its own consent

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provisions for the treatment and dissemination of medical and or personal information in keeping with all applicable privacy laws.

- 1.7. Regenerate Health will gain the workers signed consent at all times with respect to sharing of information within Regenerate Health (between the Psychologist and Rehabilitation Consultant).

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- 1.8. Regenerate Health will ensure that every one of its clients is issued with the Regenerate Health Privacy Policy document upon commencement of service provision that explains how the information pertaining to their personal and health records is collected, held, used and disclosed.
- 1.9. Regenerate Health's Privacy Policy also provides injured workers with direction pertaining to the management of health care information. The relevant Acts, being the Privacy Act 1988 and the Health Records and Information Privacy Act 2002.
- 1.10. In the event that information is shared between the Psychologist and Rehabilitation Consultant, it will be in the spirit of return to work only.
- 1.11. In the event that a worker or other relevant stakeholder makes a complaint against Regenerate Health in relation to a perceived conflict of interest, malpractice or fraud matter, Regenerate Health may seek support and advice from a representative of the Health Care Complaints Commission and / or professional association when investigating the complaint. For serious matters, Regenerate Health will also appoint an Independent Auditor to review the matter and liaise with the complainant and/or relevant stakeholders. Regenerate Health will handover the communication process to the Independent Auditor and the Health Care Complaints Commission for investigation and reporting. At the time of writing, Regenerate Health's designated independent representative is Mr Jamie Travis. Mr Travis is an independent SIRA, Workplace Injury Management branch Approved Auditor.