

Waylight Pty Ltd

Waylight Plan Management

Document Title	Code of Conduct Policy
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Approved By	Joshua, Director
Classification	Internal

1. Purpose

This policy establishes Waylight's commitment to the NDIS Code of Conduct and sets out the behavioural standards required of all workers and contractors in delivering plan management services. The NDIS Code of Conduct applies to all registered NDIS providers, their workers, and contractors.

2. Scope

This policy applies to all workers, contractors, and volunteers engaged by Waylight Pty Ltd in the delivery of plan management services.

3. Applicable Standards

- NDIS Code of Conduct, all 8 elements as set out in the National Disability Insurance Scheme Act 2013 and the NDIS Code of Conduct (Worker Guidance) and (Provider Guidance).
- NDIS Practice Standards. Verification Module.

4. The NDIS Code of Conduct, 8 Elements

- Element 1: Act with respect for individual rights to freedom of expression, self-determination, and decision-making in accordance with applicable laws and conventions.
- Element 2: Respect the privacy of people with disability.
- Element 3: Provide supports and services in a safe and competent manner with care and skill.
- Element 4: Act with integrity, honesty, and transparency.
- Element 5: Promptly take steps to raise and act on concerns about matters that may impact the quality and safety of supports and services provided to people with disability.
- Element 6: Take all reasonable steps to prevent and respond to all forms of violence against, and exploitation, neglect and abuse of, people with disability.
- Element 7: Take all reasonable steps to prevent and respond to sexual misconduct.

- Element 8: Not engage in unfair pricing when supplying or promoting goods for NDIS participants.

5. How Waylight Applies Each Element

5.1 Respect and Self-Determination (Element 1)

- Waylight respects each participant's right to choose their own service providers.
- Waylight does not direct participants on how to use their NDIS funds, the participant decides.
- Participants are supported to understand their budget and make informed decisions.
- Communication is in plain English, adapted to each participant's needs.

5.2 Privacy (Element 2)

Waylight protects participant privacy in accordance with WL-POL-13 Information Management Policy. Information is collected only as necessary, stored securely, and not disclosed without consent or legal requirement.

5.3 Safe and Competent Service (Element 3)

Waylight ensures all workers and contractors are qualified, screened, and trained per WL-POL-10 and WL-POL-11. Plan management services are delivered within Waylight's scope of registration and competence.

5.4 Integrity, Honesty, and Transparency (Element 4)

- Waylight declares all conflicts of interest (WL-POL-03).
- Waylight does not accept inducements, referral fees, or gifts of more than minor value from service providers.
- Waylight provides accurate information about its services, qualifications, and costs.
- Waylight does not make false claims about supports or services.

5.5 Raising Concerns (Element 5)

All workers and contractors promptly raise concerns about quality or safety. Waylight's incident management (WL-POL-07) and complaints management (WL-POL-08) systems provide clear pathways. Whistleblower protection applies (WL-POL-02).

5.6 Preventing Violence, Exploitation, Neglect, and Abuse (Element 6)

Waylight takes all reasonable steps to prevent and respond to violence, exploitation, neglect, and abuse. Financial exploitation is a particular risk in plan management. Waylight's fraud prevention controls (WL-POL-02) and participant money protections (WL-POL-04) address this.

5.7 Preventing Sexual Misconduct (Element 7)

Waylight takes all reasonable steps to prevent and respond to sexual misconduct. All workers undergo NDIS Worker Screening, which includes checks for relevant criminal history. Any allegation of sexual misconduct is treated as a reportable incident (WL-POL-07).

5.8 Fair Pricing (Element 8)

- Waylight does not engage in unfair pricing.
- Waylight's plan management fee is set by the NDIS Pricing Arrangements and Price Limits. Waylight does not charge above this.
- Waylight does not charge participants anything out of pocket, all fees are funded from the participant's NDIS plan under Support Category 7.
- Waylight checks that service provider invoices do not exceed PAPL price limits before lodging claims.

6. Breach of the Code of Conduct

- Any breach of the Code of Conduct by a Waylight worker or contractor is treated seriously.
- Step 1: The Director investigates the alleged breach.
- Step 2: If substantiated, appropriate action is taken: coaching, formal warning, or termination of engagement depending on severity.
- Step 3: If the breach constitutes a reportable incident, it is managed under WL-POL-07.
- Step 4: If the breach involves a criminal offence, it is reported to police.
- Step 5: The NDIS Commission may also take action under the NDIS Act.

7. Responsibilities

Role	Responsibility
Director (Joshua)	Models Code of Conduct behaviour. Investigates breaches. Ensures all workers and contractors understand their obligations.
Contractor-Accountant	Complies with the Code of Conduct. Reports breaches. Signs acknowledgement.
Plan Management Worker (future)	Complies with the Code of Conduct. Reports breaches. Signs acknowledgement at induction.
Participants	Are informed of the Code of Conduct and how it protects them. Can raise concerns about breaches.

8. Related Documents

- WL-POL-02 Fraud Prevention Policy (Element 4)
- WL-POL-03 Conflict of Interest Policy (Element 4)
- WL-POL-04 Participant Money & Property Policy (Elements 1, 4)
- WL-POL-07 Incident Management Policy (Elements 5, 6, 7)

- WL-POL-08 Complaints Management Policy (Element 5)
- WL-POL-13 Information Management Policy (Element 2)
- NDIS Code of Conduct. Worker Guidance
- NDIS Code of Conduct. Provider Guidance

9. Audit Readiness Notes

- Q: 'How do you ensure your workers comply with the NDIS Code of Conduct?', A: Every worker and contractor signs an acknowledgement at induction. The Code is covered in induction training. Each policy references the relevant Code elements. If there is a breach, I investigate and take action, up to termination for serious breaches.
- Q: 'How does Element 8 (fair pricing) apply to you as a plan manager?', A: My fee is set by the PAPL, I do not charge above it. Participants pay nothing out of pocket. I also check that service provider invoices do not exceed PAPL price limits. If they do, I query with the provider before processing.
- Q: 'What about conflict of interest under Element 4?', A: I have a declared conflict, I work as a support worker elsewhere. It is in the Conflict of Interest Register. I do not process invoices from my employer without independent review by the Contractor-Accountant. Participants are informed if there is any conflict affecting their services.

10. Review

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

Version History

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