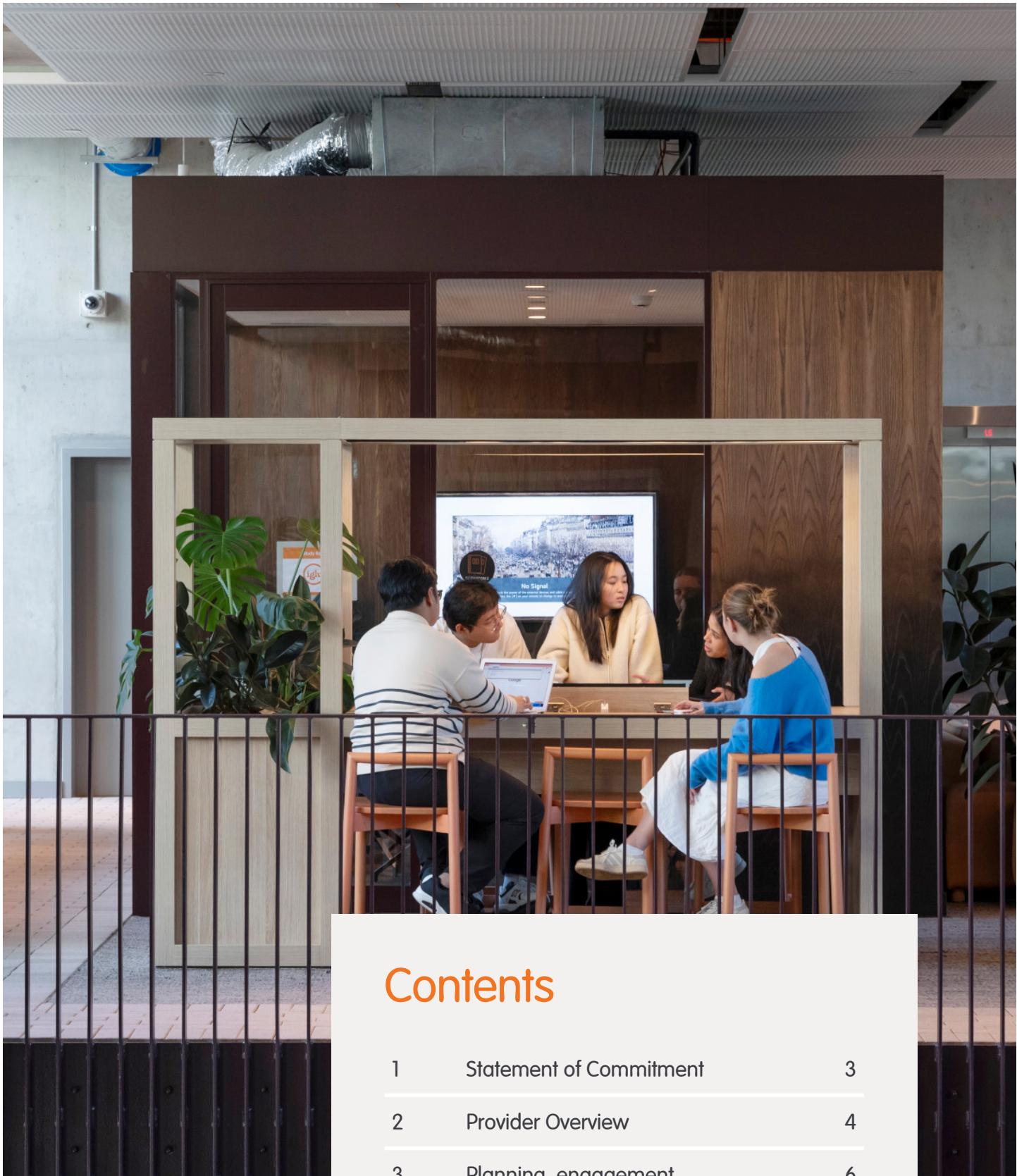




Whole-of-Organisation Gender-based Violence Prevention and Response Plan and Outcomes Framework

Provider name | Iglu Pty Ltd

Plan period | 1 January 2026 to 31 December 2029



Contents

1	Statement of Commitment	3
2	Provider Overview	4
3	Planning, engagement and evidence	6
4	Approach	8
5	Whole-of-Organisation Gender-based Violence Prevention and Response Plan	11
6	Outcomes Framework	15

1 Statement of Commitment

Iglu is committed to fostering safe, respectful, and inclusive student accommodation communities for all our residents. We have zero tolerance for sexual harm, harassment, misconduct, gender-based violence, bullying, discrimination, or any behaviour that compromises the wellbeing of our residents.

Our Safer Communities approach encompasses all areas that impact the safety, inclusion, and wellbeing of our residents — including the prevention and response to harassment, sexual assault, gender-based violence (GBV), scams, discrimination, and any other form of unacceptable behaviour.

Iglu provides support services and has dedicated policies and procedures to ensure the safety and wellbeing of all residents while they live within our communities. We endeavour to provide a safe and supportive environment during their stay by:

- Providing training to all team members on Applying First Aid, Mental Health awareness, safer communities (bystander, leadership and disclosures) and critical incident response.
- Conducting wellbeing check-ins with residents as required.
- Actively promoting and encouraging participation in our community events program to build connection, inclusion, and belonging.

Iglu also collaborates closely with our university partners to strengthen shared safety and wellbeing outcomes for residents. This includes bi-annual property visits and reports, sharing of market information and operational learnings. Where Under 18 international students are residing at select Iglu properties, we work closely with our partners to manage curfew and welfare arrangements.

1.1 ACCOUNTABILITY

This plan has been developed by the Head of Operations and the General Manager, Partnerships, with the full support of Iglu's Leadership Team and endorsed by the Company Directors.

Iglu will ensure all team members are aware of this plan and understand their responsibilities and obligations to uphold the safety, wellbeing, and inclusion of all residents within our communities. In accordance with our organisational values and Ethical Conduct Policy all Iglu team members will:

- Foster a resident community in which all forms of abuse, bullying, harassment, and exploitation by other team members, residents, or contractors is not accepted.
- Be alert to incidents of harm, abuse, or neglect that may occur within or outside our communities and report concerns through the appropriate channels.
- Communicate and engage with residents respectfully and appropriately at all times.

Additionally, Operational Managers will:

- Create and maintain a team culture where safety, respect, and inclusion are understood, endorsed, and demonstrated by all team members.
- Foster an environment where residents feel safe to provide feedback or report incidents, ensuring all interactions are handled with respect, and confidentiality.
- Be accessible and available to provide support and guidance to residents and team members.
- Ensure fair and equitable treatment of all residents and team members, maintaining an environment free from discrimination, prejudice, or preferential treatment.

2 Provider Overview

ORGANISATION BACKGROUND

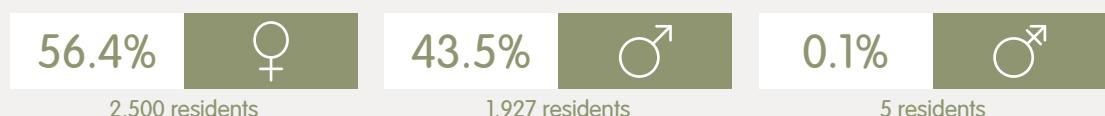
Iglu was established in 2010 to provide purpose-built, community-oriented housing for students in Australia. With properties located in Sydney, Brisbane, and Melbourne, Iglu offers secure, modern living environments designed to support academic success, wellbeing, and cultural exchange. Iglu aims to support a positive education experience for the students enrolled in tertiary institutions by ensuring students have access to safe, supportive housing near major campuses, local amenities and transport hubs.

Iglu accommodates approximately 4,500 students annually across multiple properties. Our buildings are designed to foster community living, with a variety of studio and shared apartments, communal kitchens, study areas, and social spaces.



Student Profile [Total Residents: 4,432]

Gender



Age



Citizenship and country of origin



Enrolment type

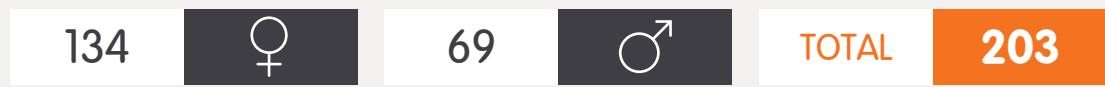


Team Profile [Total Iglu Team Members: 269]

Home Office



Property & Operations



Data accurate as at 1 Dec 2025

2 Provider Overview

WHOLE-OF-ORGANISATION SCOPE

This Whole-of-Organisation Plan applies to:

- All Iglu residents.
- All Iglu team members.
- All Iglu-operated properties and affiliated services.

The scope reflects Iglu's commitment to embedding gender prevention and response across every gender-based violence aspect of its operations, ensuring that safety and respect are integral to the student living experience.



EXPERIENCE AND APPROACH

Iglu understands that the fundamental relationship with residents is that of a landlord and tenant, and our purpose of delivering Warm Hospitality ensures we actively cultivate a sense of community that promotes respect, safety and harmony to minimise opportunities for inappropriate or antisocial behaviour.

Iglu has taken proactive steps to promote respectful relationships and prevent gender-based violence within its communities. Initiatives have included:

- Orientation programs emphasising consent, respect, and community values.
- Partnerships with universities and external organisations to provide wellbeing support and referral pathways.
- Training for all operational Iglu team members in responding to disclosures and supporting residents.
- Implementation of secure reporting mechanisms for residents to raise concerns anonymously or directly.

These initiatives provide a strong foundation for the Whole-of-Organisation Plan, which will build on existing practices and align with the requirements of the 2024 National Code Addressing Gender-based Violence in Higher Education.

3 Planning, engagement and evidence

Iglu's Whole-of-Organisation Plan has been developed through consultation with residents, team members, and operational leaders, supported by data analysis and a review of systemic risks and enablers.

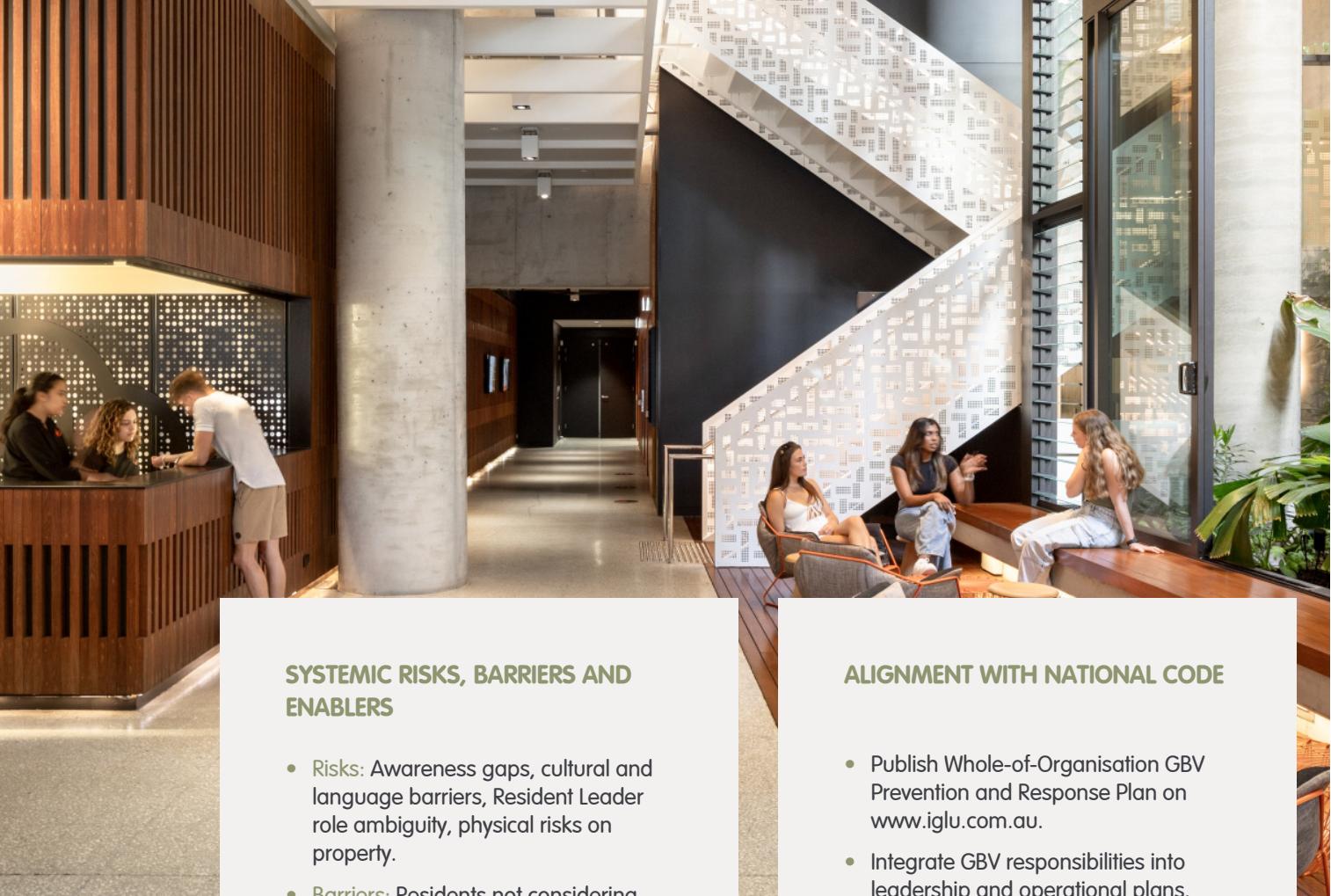
ENGAGEMENT ACTIVITIES

- Resident Leader consultation sessions across multiple properties to capture insights on safety, boundaries, cultural considerations, and barriers to disclosure.
- Resident feedback survey to understand demographics, awareness of gender-based violence, and ideas for improvement.
- Consultation with Operational Managers, Resident Leaders, and the People Team to identify operational challenges and training needs.
- Engage gender-based violence experts to provide specialised advice and guidance during the review of consultation outcomes, gap needs analysis, and the development of the risk assessment procedure
- **Actions taken:** Updated training modules, introduced multiple reporting and disclosure pathways, and increased awareness of these options for both residents and team members.

DATA ANALYSIS AND EVIDENCE REVIEWED

- Analysis of data from the incident and hazard reporting system to understand the prevalence of potential gender-based violence incidents across all Iglu properties. The analysis included a review of over 1,300 reported incidents across all Iglu properties (2022-2025) to identify factors that could be considered as a gender-based violence incident.
- Combined data from face-to-face consultation sessions (39 Residents) and an anonymous survey (16 responses) to understand our community's awareness of gender-based violence prevention and response, and their experiences in day-to-day life at Iglu, their university and in public. The consultative group consisted of women, international and culturally diverse, and LGBTQI+ students currently living at Iglu properties in Melbourne, Sydney and Brisbane.





SYSTEMIC RISKS, BARRIERS AND ENABLERS

- **Risks:** Awareness gaps, cultural and language barriers, Resident Leader role ambiguity, physical risks on property.
- **Barriers:** Residents not considering disclosure to Iglu team members as a support option, fear of judgment, cultural considerations and past experiences in other organisations leading to reports feeling dismissed.
- **Enablers:** Strong Resident Leader engagement, existing Safer Communities framework.
- **Data capture:** Surveys, consultation sessions with Resident Leaders, audits, incident reporting.
- **Risk mitigation:** Mandatory Safer Communities training, anonymous reporting options, property safety upgrades, 48-hour risk assessment.

ALIGNMENT WITH NATIONAL CODE

- Publish Whole-of-Organisation GBV Prevention and Response Plan on www.iglu.com.au.
- Integrate GBV responsibilities into leadership and operational plans.
- Work proactively with university partners to share learnings and increase support networks available to students.
- Implement trauma-informed, person-centred response protocols.
- Provide multiple reporting pathways and support services.
- Ensure risk assessments and safety planning occur within 48 hours of disclosure.
- Collect and report GBV data securely and in line with privacy requirements.
- Review and update the plan every three years, with ongoing monitoring and evaluation.

NEXT STEPS

- Finalise and publish the plan.
- Communicate the plan to the whole business.
- Launch new training modules for team members, Resident Leaders, and orientation materials for residents.
- Upgrade property safety measures based on risk assessments.
- Establish a feedback loop to monitor progress and ensure transparency.

4 Approach

Iglu adopts a proactive, whole-of-organisation approach to gender-based violence prevention and response. This includes embedding safety and wellbeing into all operational areas, fostering a culture of respect, and ensuring trauma-informed practices. Our approach is guided by zero tolerance for sexual assault, gender-based violence, harassment, and discrimination, and is supported by governance, training, and partnerships.

Iglu provides and supports multiple reporting pathways, including both direct and anonymous reporting options, such as face-to-face disclosures, national and regional helplines, Tertiary Provider services, and third-party counselling and support services (Sonder). Our approach ensures trauma-informed, person-centred responses. Disclosures are managed promptly and sensitively through documented workflows such as our Critical Incident Repose and our Resident Grievance and Dispute Handling processes. Immediate safety planning, risk assessment, and escalation protocols are in place, including relocation of affected parties where required.

Prevention initiatives focus on education, cultural consideration, responsiveness, and inclusion. Iglu delivers Safer Communities Training for all team members that includes awareness, prevention, disclosure and Responding with Compassion, and aim to enhance respectful relationships through continuing community engagement and awareness campaigns. Risk management practices are embedded into event planning and operational reviews, supported by the Safety and Improvement Manager.

EFFORTS TO DATE AND LESSONS LEARNED

Key Initiatives Implemented:

- **Mandatory Safer Communities Training for all Iglu Team Members:**

This training module addresses myths and realities of sexual assault, harassment, and gender-based violence. It covers:

- Understanding consent and respectful relationships.
- How to act as an ethical bystander.
- Responding to disclosures with a trauma-informed approach.
- Reinforcing Iglu's zero-tolerance stance on sexual harm and unacceptable behaviour.

- **Delivered Full Stop Australia's Responding with Compassion course to Operational Managers (with rollout planned for the rest of our property teams):**

This program equips team members to respond compassionately to disclosures of trauma. Participants will:

- Adopt a trauma-informed and person-centred approach when responding to disclosures, ensuring empathy, respect, and safety.
- Develop awareness of the impacts of trauma on behaviour, memory, health, and wellbeing, and understand the societal and individual effects of sexual assault, domestic, and family violence.
- Recognise and respond to the needs of all community members, including those disproportionately affected by GBV such as women, First Nations people, culturally and linguistically diverse communities, people with disability, and people of diverse sexual orientation and gender identity.
- Learn from accredited specialists with expertise in GBV response, ensuring training is evidence-based and aligned with best practice.
- Safely manage disclosures that may arise during training, including receiving information about internal reporting channels and external support services available to those who have experienced GBV.

- **Partnership with Sonder for 24/7 Wellbeing and Crisis Support:**

Residents and team members have access to:

- Immediate assistance in emergencies.
- Mental health and wellbeing support.
- Direct and anonymous reporting options.

4 Approach

• Structured Grievance Handling Processes:

Iglu has implemented:

- A clear Resident Grievance and Dispute Handling Guide.
- Defined workflows for managing disclosures and complaints.
- Secure and confidential record-keeping to protect all parties.

• Incident reporting and investigation:

- Dedicated incident reporting system.
- Investigation and Manager review.
- Escalation process and follow up.

LESSONS LEARNED

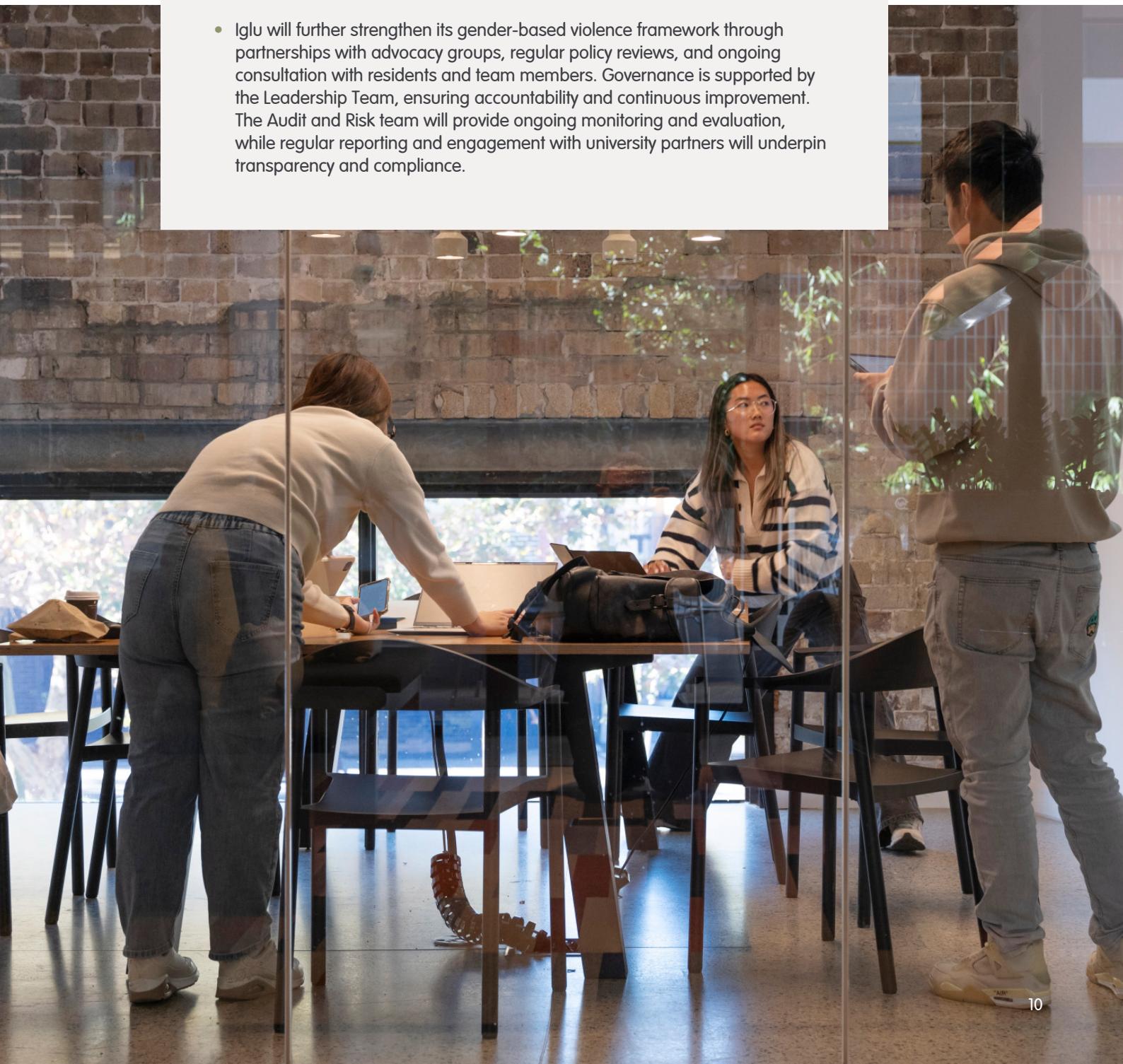
- Training must be ongoing and tailored to include gender-based violence specific content for residents and team members.
- Awareness campaigns and proactive engagement (e.g., during orientation) increase trust and reporting.
- Partnerships like Sonder strengthen safety but require consistent promotion to ensure residents know how to access these services.
- Structured processes improve response consistency but need integration of gender-based violence specific risk assessments and escalation protocols.

INITIATIVE	CURRENT STATUS	NEXT STEPS
Safer Communities training	Implemented and ongoing	Expanded to include gender-based violence specific content for residents
Responding with Compassion training	Implemented and ongoing	Annual refresh and extended to all property team members
Partnership with Sonder for wellbeing and crisis support	Active	Promote services during orientation and events
Direct and anonymous reporting options via third parties	Active	Increase awareness through digital and physical communication channels
Resident Grievance and Dispute Handling Workflow	Implemented and part of Resident Orientation	Integrate GBV-specific risk assessment and safety planning
Policy gaps identified	In development	Publish WOOP and update HR Policies
Risk assessment expertise	In progress	Engage external experts for GBV risk assessments and team member training

4 Approach

MONITORING, EVALUATION AND CONTINUOUS IMPROVEMENT

- Iglu will implement a structured framework to monitor progress, evaluate impact, and drive continuous improvement of its GBV Prevention and Response Plan. This will include tracking key indicators such as disclosures, training completion, and risk assessments, conducting annual reviews and resident feedback surveys. Findings will inform updates to policies, training, and processes, with results reported to leadership and shared transparently through annual reporting. Secure systems and regular consultation with residents and team members will ensure initiatives remain inclusive, trauma informed, and responsive to emerging needs.
- Iglu will further strengthen its gender-based violence framework through partnerships with advocacy groups, regular policy reviews, and ongoing consultation with residents and team members. Governance is supported by the Leadership Team, ensuring accountability and continuous improvement. The Audit and Risk team will provide ongoing monitoring and evaluation, while regular reporting and engagement with university partners will underpin transparency and compliance.



5 Whole-of-Organisation Gender-based Violence Prevention and Response Plan

Effective governance and a whole-of-organisation approach, prioritising safety and support, in the prevention of and response to gender-based violence

ACTION	RESPONSIBLE	TIMELINE	RESOURCES
<p>Publish Whole-of-Organisation Gender-based Violence Prevention and Response Plan</p> <ul style="list-style-type: none"> Develop and release a formal plan outlining Iglu's commitment, responsibilities, and processes for GBV prevention and response. Ensure visibility on internal platforms and during team briefings. 	<ul style="list-style-type: none"> Head of Operations General Manager, Partnerships General Manager, Brand & Communications 	Q4 2025	<ul style="list-style-type: none"> Leadership Team
<p>Establish GBV Working Group (cross-functional)</p> <ul style="list-style-type: none"> Form a group with representatives from Operations, Partnerships, Health & Safety, People and Property teams to oversee implementation, monitor progress, and review emerging risks quarterly. 	<ul style="list-style-type: none"> GBV Working Group 	Q4 2025	<ul style="list-style-type: none"> Leadership Team Governance

Environments are safe, and systems continuously improve to prevent and respond to gender-based violence

ACTION	RESPONSIBLE	TIMELINE	RESOURCES
<p>Update HR training to include GBV declarations and NDA prohibition including intimate relationship declaration. Update employment contracts to include notification of declaration obligations.</p>	<ul style="list-style-type: none"> People Team 	Q2 2026	<ul style="list-style-type: none"> Policy templates Learning Management System Employee contracts
<p>Update property House Rules to include expectations, responsibilities and options as they relate to GBV incidents</p>	<ul style="list-style-type: none"> GBV Working Group 	Q4 2025	<ul style="list-style-type: none"> House Rules
<p>Conduct GBV risk assessments for all properties</p>	<ul style="list-style-type: none"> Operational Managers 	Q2 2026	<ul style="list-style-type: none"> External consultant (Full Stop Australia)
<p>Implement risk management for social events. Develop event guidelines that include supervision ratios, safe transport options, and escalation protocols for incidents.</p>	<ul style="list-style-type: none"> Safety & Improvement Manager 	Q2 2026	<ul style="list-style-type: none"> Event guidelines

5 Whole-of-Organisation Gender-based Violence Prevention and Response Plan

Build knowledge and capability to safely and effectively prevent and respond to gender-based violence

ACTION	RESPONSIBLE	TIMELINE	RESOURCES
<p>Implement annual refresher on the Iglu Safer Communities Training Module</p> <ul style="list-style-type: none"> • Ensure all team members complete yearly refresher e-learning updates covering GBV awareness, reporting obligations, and bystander intervention. 	<ul style="list-style-type: none"> • People Team 	Q1 2026	<ul style="list-style-type: none"> • Learning Management System
<p>Deliver GBV training for all property-based team members (Responding with Compassion)</p> <ul style="list-style-type: none"> • Provide practical training on trauma-informed responses, confidentiality, and escalation pathways for disclosures. 	<ul style="list-style-type: none"> • People Team 	Q2 2026	<ul style="list-style-type: none"> • External consultant (Full Stop Australia)
<p>Expand Resident Leader training to include GBV-specific modules</p> <ul style="list-style-type: none"> • Add content on recognising early warning signs, managing blurred boundaries, and conducting wellbeing checks, as suggested by student feedback. • Cultural competency and language inclusion training to improve confidence with diverse cohorts and reduce barriers to challenging behaviour. 	<ul style="list-style-type: none"> • People Team 	Q2 2026	<ul style="list-style-type: none"> • Consultation sessions • Training • External consultant (Full Stop Australia)

Responses and support services are safe and person-centred

ACTION	RESPONSIBLE	TIMELINE	RESOURCES
<p>Promote Sonder and trauma-informed support pathways during orientation</p>	<ul style="list-style-type: none"> • Brand & Communications Team • Operational Managers 	Q1 2026	<ul style="list-style-type: none"> • Orientation materials • Sonder partnership • Communication materials
<p>Include the Grievance Handling process in Resident Orientation Training to ensure complaints are handled in a timely, trauma-informed manner, with clear escalation and documentation requirements.</p>	<ul style="list-style-type: none"> • People Team • Operational Managers 	Q2 2026	<ul style="list-style-type: none"> • Orientation materials
<p>Provide translatable and culturally sensitive materials</p> <ul style="list-style-type: none"> • Translatable key resources and ensure they reflect diverse cultural norms to reduce barriers to disclosure. 	<ul style="list-style-type: none"> • Brand & Communications Team • Operational Managers 	Q2 2026	<ul style="list-style-type: none"> • Marketing collateral

5 Whole-of-Organisation Gender-based Violence Prevention and Response Plan

Gender-based violence responses are safe and timely

ACTION	RESPONSIBLE	TIMELINE	RESOURCES
Implement 48-hour risk assessment and safety planning for disclosures <ul style="list-style-type: none"> • Create a protocol for managers to assess risk and implement safety measures (e.g., temporary relocation, wellbeing checks) within 48 hours. 	<ul style="list-style-type: none"> • Safety & Improvement Manager • Operational Managers 	Q2 2026	<ul style="list-style-type: none"> • Incident guide • Safety System (Donesafe) • Manager training
Develop relocation protocol for affected parties in accommodation <ul style="list-style-type: none"> • Document clear steps for relocating affected individuals subject to risk assessment, ensuring minimal disruption and safety for all parties in compliance with the applicable tenancy agreement. 	<ul style="list-style-type: none"> • Head of Operations • Operational Managers 	Q3 2026	<ul style="list-style-type: none"> • Policy guidance • Legal advice

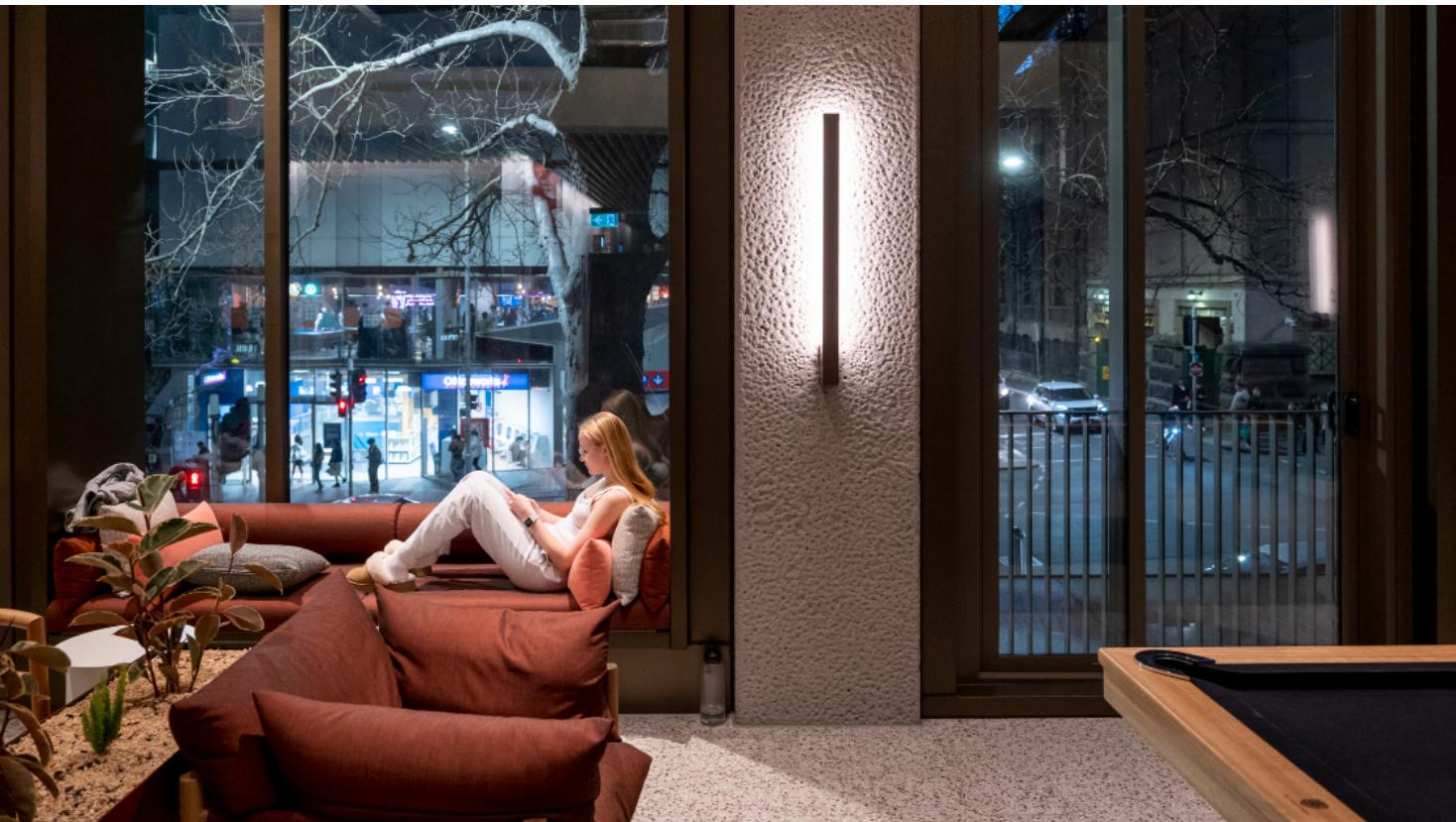
Use evidence to approach, measure change and contribute to the national evidence-base

ACTION	RESPONSIBLE	TIMELINE	RESOURCES
Enhance data collection via Donesafe and monthly reporting <ul style="list-style-type: none"> • Track GBV-related incidents, training completion, and risk assessments in Donesafe; review trends monthly for continuous improvement. 	<ul style="list-style-type: none"> • Safety & Improvement Manager 	Q2 2026	<ul style="list-style-type: none"> • Safety System (Donesafe) • Reporting templates • Learning Management System
Conduct annual resident feedback survey on GBV awareness and safety <ul style="list-style-type: none"> • Gather insights on awareness, trust in reporting systems, and perceived safety; use findings to refine actions. 	<ul style="list-style-type: none"> • Head of Operations • Operational Managers 	Annually	<ul style="list-style-type: none"> • Survey tool • Consultation sessions

5 Whole-of-Organisation Gender-based Violence Prevention and Response Plan

Student accommodation is safe for all students and team members (where relevant)

ACTION	RESPONSIBLE	TIMELINE	RESOURCES
<p>Promote GBV prevention campaigns during orientation</p> <ul style="list-style-type: none"> Include education and reporting information in orientation sessions and social activities 	<ul style="list-style-type: none"> Operational Managers 	Q1 2026	<ul style="list-style-type: none"> Marketing collateral Digital marketing platforms Resident events House Rules
<p>Implement risk management for social events</p>	<ul style="list-style-type: none"> Operational Managers 	Q2 2026	<ul style="list-style-type: none"> Event guide Safety System (Donesafe) Learning Management Platform
<p>Train Resident Leaders on managing blurred boundaries and wellbeing checks</p> <ul style="list-style-type: none"> Equip Resident Leaders with skills to maintain professional boundaries, identify signs of distress, and refer residents to appropriate support. 	<ul style="list-style-type: none"> Operational Managers 	Q2 2026	<ul style="list-style-type: none"> Resident Leader consultation sessions Internal training



4 Outcomes Framework

OUTCOME	SUB-OUTCOMES	INDICATORS	MEASURES ((OF IMPACT OR PROGRESS)
Effective governance and a whole-of-organisation approach, prioritising safety and support, in the prevention of and response to gender-based violence	GBV responsibilities into leadership and operational plans	Governance include GBV actions	<ul style="list-style-type: none"> Review of leadership responsibilities and operational plans
	GBV Working Group established	Annual reporting Regular meetings	<ul style="list-style-type: none"> Annual report GBV Working Group meets quarterly
Environments are safe, and systems continuously improve to prevent and respond to gender-based violence	Risk assessments completed for all properties	Number of risk assessments completed	<ul style="list-style-type: none"> Annual property risk assessments completed by Q2
	Event risk management implemented	Compliance with event guidelines	<ul style="list-style-type: none"> Monthly audits of compliance with safety requirements Event risk assessments reviewed before each event
Build knowledge and capability to safely and effectively prevent and respond to gender-based violence	Operational team members complete Safer Communities and Responding with Compassion training	Training completion rates	<ul style="list-style-type: none"> 100% operational team members complete Safer Communities training within their first month of employment Completing the Responding with Compassion training
	Resident Leaders trained in GBV issues and trauma-informed response	Training attendance and feedback	<ul style="list-style-type: none"> Resident Leader training delivered yearly with feedback collected
Responses and support services are safe and person-centred	Residents and team members know how to access support	Awareness survey results from Residents	<ul style="list-style-type: none"> Awareness campaigns during orientation Ongoing consultation sessions Resident surveys conducted annually
Gender-based violence responses are trauma informed and timely	48-hour risk assessment protocol implemented	Time from disclosure to safety plan	<ul style="list-style-type: none"> 48-hour risk assessment protocol monitored via Donesafe
	Disclosures are received and managed in line with the trauma informed response principles	Trauma informed response principles are demonstrated	<ul style="list-style-type: none"> Investigation documentation and updates detail measures and actions in line with principles

4 Outcomes Framework

OUTCOME	SUB-OUTCOMES	INDICATORS	MEASURES ((OF IMPACT OR PROGRESS)
Use evidence to approach, measure change and contribute to the national evidence-base	GBV data tracked in Donesafe	Monthly reporting completed	<ul style="list-style-type: none"> Incident data logged in Donesafe within 24 hours
	Resident feedback informs improvements	Survey response rates	<ul style="list-style-type: none"> Resident feedback integrated into response plan
Student accommodation is safe for all students and staff	Orientation includes GBV prevention	Orientation materials reviewed	<ul style="list-style-type: none"> Orientation materials reviewed annually GBV prevention content delivered at all properties
	Event risk management applied	Documented Event reviews	<ul style="list-style-type: none"> Event reviews conducted



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