

	Safeguarding Vulnerable People Policy and Procedure	
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1.0 INTRODUCTION

This policy outlines Our Rainbow House's commitment to safeguarding the vulnerable people with whom we work, and preventing sexual exploitation, abuse and harassment (PSEAH) across all organisational activities, partnerships and operations.

As an organisation working with vulnerable communities, Our Rainbow House recognises that unequal power relationships can increase the risk of exploitation, abuse, harassment, neglect, discrimination and other forms of harm. Power imbalances may exist between representatives of Our Rainbow House and the people and communities with whom we work due to differences in authority, access to resources, knowledge, social status or dependence on services and support.

Where these power imbalances are not recognised and managed appropriately, they may result in both intentional and unintentional harm. This may include coercion, exploitation, exclusion from decision-making, loss of dignity or autonomy, discrimination, inappropriate influence, or practices that inadvertently place people at increased risk. We recognize that harm is not limited to deliberate abuse. It can also arise from:

- misuse of authority or influence;
- dependency created through aid relationships;
- unconscious bias or paternalistic behaviour;
- inappropriate decision-making that excludes community voices;
- well-intentioned actions that undermine dignity, autonomy or safety.

Our Rainbow House is committed to recognising these risks and taking reasonable steps to prevent harm, promote inclusion and ensure all interactions are conducted with dignity, respect and accountability.

Our Rainbow House complies with all applicable Australian and Zambian laws, relevant international human rights standards, and safeguarding obligations under the ACFID Code of Conduct and DFAT requirements.

2.0 REFERENCE

- *Anti-Gender-Based Violence Act 2011 (Zambia)*
- *Australian Charities and Not-for-profits Commission (ACNC) Act 2012 (Cth)*
- *Australian Charities and Not-for-profits Commission (ACNC) External Conduct Standards*
- *Australian Council for International Development (ACFID) Code of Conduct*
- *Convention on the Rights of Persons with Disabilities (2006)*
- *Department of Foreign Affairs and Trade (DFAT) Preventing Sexual Exploitation, Abuse and Harassment (PSEAH) Policy*
- *Privacy Act 1988 (Cth)*
- *Universal Declaration of Human Rights (1948)*

- *Our Rainbow House Child Protection Code of Conduct*
- *Our Rainbow House Child Protection Policy and Procedure*
- *Our Rainbow House Code of Conduct*
- *Our Rainbow House Communications Policy and Procedure*
- *Our Rainbow House Complaints Handling Policy and Procedure*
- *Our Rainbow House Confidentiality Policy and Procedure*
- *Our Rainbow House Gender Equality, Disability and Social Inclusion (GEDSI) Policy*
- *Our Rainbow House Partnership Agreement Template*
- *Our Rainbow House Partnership Assessment Criteria*
- *Our Rainbow House Privacy Policy and Procedure*
- *Our Rainbow House Project Monitoring and Evaluation Tool*
- *Our Rainbow House Project Planning Tool*
- *Our Rainbow House Record-Keeping Policy and Procedure*
- *Our Rainbow House Risk Register*
- *Our Rainbow House Whistleblower Policy and Procedure*

3.0 DEFINITIONS

Abuse includes physical, sexual, emotional, psychological, neglect, bullying, forced labour and domestic violence. Abuse can be actual or threatened and can happen to people of all ages, ethnicity and social backgrounds, abilities, sexual orientation, religious beliefs and political persuasion. Abuse can be inflicted by both men and women and can be carried out through force, coercion, manipulation, intimidation or unequal power relationships.

- Physical abuse occurs when a person purposefully injures or threatens to injure another person. This may take the form of slapping, punching, shaking, kicking, burning, shoving or pinching or grabbing. The injury may take the form of bruises, cuts, burns or fractures.
- Emotional abuse occurs when a person is repeatedly rejected or frightened by threats. This may involve name calling, or being put down, to the extent that it affects the person's physical and emotional well-being and behaviour.
- Neglect is the persistent failure or the deliberate denial to provide a vulnerable person, where possible, with clean water, food, shelter, sanitation, supervision or care to the extent that their health and well-being is placed at risk.
- Sexual abuse means the actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions¹. It includes all forms of sexual violence including incest, early and forced marriage, rape, involvement in pornography, indecent touching, grooming, using sexually explicit language towards a child or vulnerable person, and showing sexually exploitative pornographic material.

Adult of Influence shall mean any adult associated with the Our Rainbow House community. This includes staff members, board members, volunteers, visitors, sponsors and donors.

Beneficiary shall mean any individual who currently participates in, receives support from, or is otherwise directly engaged through an Our Rainbow House program or activity. This includes students, staff members, guardians, caregivers and other program participants. Where safeguarding risks arise from relationships established through Our Rainbow House programs, this policy may also apply to former beneficiaries and their families.

Child shall mean any student of Our Rainbow House School, any sponsored high school student under the age of 18, any former student of Our Rainbow House under the age of 18, or any other person under the age of 18 years that has any form of contact with Our Rainbow House activities.

¹ The definitions for both Sexual Exploitation and Sexual Abuse are contained in the United Nations Secretary-General's Bulletin, "Special measures for protection from sexual exploitation and sexual abuse" ST/SGB/2003/13 (9 October 2003) [hereinafter Secretary-General's Bulletin on SEA (2003)].

Exploitation means any actual or attempted abuse of a position of vulnerability, differential power, or trust, including, but not limited to, profiting monetarily, socially or politically from the exploitation of another, forced labour, trafficking and sexual exploitation.

Fraternisation means any relationship that involves, or appears to involve, improper use of position, influence or authority for personal benefit and may create actual or perceived conflicts of interest, favouritism or exploitation.

Grooming refers to behaviours intended to establish trust, emotional connection or dependency for the purpose of exploitation, abuse or manipulation.

Harassment occurs when a person behaves in a manner that causes another person (or group of people) to feel offended, humiliated, intimidated or frightened. It may involve inappropriate actions, behaviour, comments or physical contact that is objectionable or causes offence.

It is important to note that from a legal perspective it is irrelevant whether the harassing behaviour was intended or not.

Informed Consent means contributors (the people sharing their stories) understand why you want to document stories about them, how the stories might be used, and who the audience of their story is likely to be. Once they understand this, they are better able to consent (or not consent) to sharing their story².

Our Rainbow House Community shall mean all representatives of Our Rainbow House, students, guardians and family members, caregivers, sponsors, donors and visitors, i.e., anyone directly or indirectly involved in Our Rainbow House activities.

Our Rainbow House School shall mean the school operated by Our Rainbow House Inc. in Zambia.

Power imbalance refers to situations where one person holds real or perceived authority, influence, control, resources, status, knowledge or decision-making power over another person, creating increased risk of exploitation, coercion or abuse.

Prevention of Sexual Exploitation, Abuse and Harassment (PSEAH) means the measures taken to prevent, detect, report and respond to sexual exploitation, sexual abuse and sexual harassment.

Retaliation means any adverse action, intimidation, threat, discrimination or reprisal taken against a person because they reported or participated in a safeguarding concern or investigation.

Representative shall mean any board member, staff member, volunteer, student placement, apprentice, contractor, sub-contractor or any other person who is caused to undertake tasks or duties on behalf of Our Rainbow House.

Safeguarding means actions, policies and procedures that create and maintain protective environments to protect people from exploitation, harm and abuse of all kinds.

Sexual Exploitation means any actual or attempted abuse of a position of vulnerability, differential power or trust for sexual purposes, including, but not limited to, profiting monetarily, socially or politically from the sexual exploitation of another.

Sexual Harassment means any unwelcome sexual advance, request for sexual favours, or other unwelcome conduct of a sexual nature that causes a person to feel offended, humiliated or intimidated. Sexual harassment may occur as a single incident or repeated behaviour and may be physical, verbal, written or online.

Survivor-Centered Approach means an approach which prioritises the rights, safety, dignity, wellbeing, wishes and informed choices of the person who has experienced harm.

Transactional sex means the exchange of money, employment, goods, services or other benefit for sex, including sexual favours.

Vulnerable people are individuals who may be at increased risk of exploitation, abuse, neglect, harassment or harm due to factors including age, disability, illness, trauma, poverty, displacement, social exclusion, dependence on services, unequal power relationships or other personal, social or environmental circumstances.

² Source: ACFID Factsheet: Informed Consent - https://acfid.asn.au/sites/site.acfid/files/resource_document/ACFID-Factsheet-Informed-Consent.pdf.

4.0 SCOPE

This policy applies to:

- all representatives of Our Rainbow House (as defined above),
- all partner organisations
- all visitors to Our Rainbow House School
- all sponsors
- all media representatives undertaking work with Our Rainbow House
- all beneficiaries of Our Rainbow House services including former sponsored students over the age of 18, sponsored high school and university students over the age of 18, families of sponsored students and school community members
- any person involved in Our Rainbow House programs or fundraising and publicity activities.
- how Our Rainbow House deals with matters relating to the safeguarding of vulnerable people (as defined above).

Note: This policy operates alongside the *Our Rainbow House Child Protection Policy and Procedure*. Concerns involving children must also be managed in accordance with that policy and any applicable child protection laws.

5.0 PURPOSE

The purpose of this policy is to:

- outline and reinforce Our Rainbow House's commitment to safeguarding vulnerable people and preventing sexual exploitation, abuse and harassment (PSEAH) across all organisational activities, partnerships and operations;
- establish the standards of behaviour and safeguarding expectations that apply to all representatives of Our Rainbow House;
- promote safe, inclusive and respectful environments for all people who engage with Our Rainbow House;
- aim to prevent exploitation, abuse, harassment, neglect and other forms of harm;
- ensure safeguarding risks are identified, assessed and managed appropriately;
- promote a culture of accountability, respect and safeguarding across the organisation;
- ensure all representatives understand their safeguarding responsibilities and expected standards of conduct;
- provide accessible mechanisms for reporting safeguarding concerns;
- ensure concerns and allegations are responded to promptly, confidentially and appropriately using a survivor-centred approach;
- support compliance with applicable laws, regulations and safeguarding obligations; and
- support continuous improvement of safeguarding systems, practices and culture.

6.0 RESPONSIBILITIES

All members of the Our Rainbow House community share responsibility for creating and maintaining safe, inclusive and respectful environments that protect vulnerable people from exploitation, abuse, harassment and harm.

All Representatives of Our Rainbow House:

All representatives of Our Rainbow are responsible for:

- upholding the rights, dignity and wellbeing of all people;
- contributing to a culture of safeguarding, accountability and respect;

- complying with this policy, the *Our Rainbow House Code of Conduct* and associated policies and procedures;
- maintaining professional and appropriate boundaries;
- promoting safe, inclusive and supportive environments;
- identifying, minimising and appropriately escalating safeguarding risks;
- reporting safeguarding concerns, incidents or inappropriate behaviour in accordance with this policy;
- taking reasonable steps to prevent and respond to exploitation, abuse, harassment and other safeguarding concerns; and
- participating in safeguarding induction, training and awareness activities as required and cooperating with safeguarding assessments, investigations and response processes.

Board:

The Board is responsible for:

- providing safeguarding oversight and governance;
- promoting a strong organisational safeguarding culture;
- approving safeguarding-related policies and frameworks;
- ensuring Our Rainbow House maintains appropriate safeguarding systems, resources and risk management processes;
- monitoring safeguarding risks, incidents and organisational responses; and
- supporting continuous improvement of safeguarding practices.

Director:

The Director is responsible for:

- ensuring implementation of this policy and associated safeguarding procedures;
- ensuring appropriate safeguarding systems, reporting mechanisms and practices are in place;
- promoting safeguarding awareness and compliance across the organisation;
- ensuring safeguarding training and induction is provided to relevant personnel;
- responding appropriately to safeguarding concerns and incidents;
- escalating serious safeguarding matters to the Board where appropriate; and
- supporting a safe, respectful and inclusive organisational culture.

Operational responsibilities may be delegated to appropriate staff members, managers or designated officers.

Safeguarding Focal Person

The Safeguarding Focal Person is responsible for supporting the implementation and monitoring of safeguarding practices across the organisation. Responsibilities may include:

- serving as a designated point of contact for safeguarding concerns and enquiries;
- receiving, documenting and appropriately escalating safeguarding reports;
- supporting the management and coordination of safeguarding incidents and responses;
- ensuring confidential safeguarding records and incident registers are maintained;
- promoting safeguarding awareness and providing guidance to representatives on safeguarding obligations;
- supporting safeguarding training, induction and capacity-building activities;
- monitoring compliance with safeguarding policies and procedures;
- identifying emerging safeguarding risks and recommending improvements to safeguarding systems and practices;
- supporting safeguarding due diligence processes for partners and third parties; and
- assisting with safeguarding reporting to management, the Board, donors or relevant authorities, where appropriate.

Sponsors, Donors and Visitors

Sponsors, donors and visitors who engage with Our Rainbow House programs, beneficiaries or communities are expected to:

- comply with this policy and any related safeguarding requirements communicated by Our Rainbow House;
- maintain appropriate boundaries and respectful behaviour;
- ensure all correspondence with beneficiaries occurs through approved Our Rainbow House channels;
- not give gifts, money or benefits directly to beneficiaries without approval.
- avoid conduct that exploits vulnerability, trust or power imbalances;
- respect privacy, dignity and confidentiality;
- follow guidance provided by Our Rainbow House staff and representatives; and
- report safeguarding concerns that come to their attention.

Partner Organisations:

Our Rainbow House expects partner organisations and third parties engaged in supported activities to uphold safeguarding standards consistent with this policy.

Where appropriate, safeguarding obligations will be incorporated into partnership agreements, funding arrangements or contractual obligations. Partner organisations may be required to:

- comply with safeguarding and PSEAH requirements;
- report safeguarding concerns relating to supported activities;
- cooperate with safeguarding assessments or investigations;
- implement reasonable safeguarding measures within their operations and activities; and
- ensure relevant personnel are aware of and trained in child safeguarding expectations appropriate to their role.

Failure to comply with safeguarding requirements may result in disciplinary procedures, suspension or termination of employment, sponsorship arrangements, partnership agreements, contracts or Memorandums of Understanding (MOU), and any other action necessary to protect children.

7.0 POLICY STATEMENT

Safeguarding is a shared organisational responsibility. Our Rainbow House is committed to proactive prevention, risk management, reporting, response and continuous improvement measures that promote a culture of respect, accountability and protection.

We are committed to embedding safeguarding into our organisational culture, governance, decision-making, programs and partnerships. Safeguarding measures will be accessible, inclusive and communicated in ways that are appropriate to the needs, languages and circumstances of the people and communities with whom we work.

Our Rainbow House is guided by the following safeguarding principles:

- **Zero Tolerance**

Our Rainbow House has zero tolerance for:

- sexual exploitation;
- sexual abuse;
- sexual harassment;
- abuse of power;
- exploitation of vulnerable people;
- bullying, intimidation, neglect or discrimination;

- retaliation against any person who raises a safeguarding concern in good faith; and
- inaction in response to known or suspected incidents of sexual exploitation, abuse and harassment.

- **Rights-Based Approach**

All people have the right to safety, dignity, inclusion, participation and protection from harm. Our Rainbow House is committed to respecting, promoting and protecting the rights of all people who engage with our organisation.

- **Survivor-Centered Approach**

Safeguarding responses will prioritise the rights, safety, dignity, wellbeing, wishes and informed choices of the person who has experienced harm. Our Rainbow House will seek to minimise re-traumatisation and provide appropriate support and referral pathways where possible.

- **Disability Inclusion**

Safeguarding measures will be accessible, inclusive and responsive to the needs, rights and participation of people with disabilities.

- **Gender Equality**

Our Rainbow House recognises that gender inequality can contribute to increased safeguarding risks and vulnerability to exploitation, abuse and harassment. We are committed to promoting gender equality and addressing harmful power imbalances.

- **Cultural Safety and Respect**

Our Rainbow House will engage with individuals and communities in ways that are culturally respectful, inclusive and responsive to local contexts.

- **Accountability and Transparency**

All representatives of Our Rainbow House share responsibility for safeguarding. Safeguarding concerns will be managed in a timely, confidential, fair and appropriate manner, and organisational learning will be used to strengthen safeguarding practices.

- **Do No Harm**

Our Rainbow House will take reasonable steps to identify, assess, manage and minimise safeguarding risks arising from our activities, operations and partnerships.

Expected Standards of Behaviour

We expect all representatives to maintain the highest standards of personal and professional conduct and to act in ways that uphold the rights, dignity, wellbeing and safety of all people. Positions of trust, influence or authority must never be used to exploit, manipulate, coerce or harm another person.

All representatives of Our Rainbow House must:

- treat all people with dignity, respect and fairness;
- maintain appropriate professional boundaries;
- act honestly, ethically and responsibly;
- promote inclusion, participation and non-discrimination;
- obtain informed consent where required;
- respect privacy, confidentiality and the rights of others;
- avoid conduct that exploits vulnerabilities, trust or power imbalances;
- contribute to safe, inclusive and respectful environments;
- comply with this policy, the *Our Rainbow House Child Protection Policy*, *Child Protection Code of Conduct*, *Code of Conduct* and associated procedures; and
- promptly report safeguarding concerns, incidents, risks or suspected breaches in accordance with this policy.

Prohibited Conduct

The following conduct is strictly prohibited:

- sexual exploitation, sexual abuse or sexual harassment;
- grooming, coercion, manipulation or predatory behaviour;
- engaging in exploitative, inappropriate or abusive relationships;
- exchanging money, employment, goods, services, accommodation or assistance for sexual activity or sexual favours;
- engaging in sexual activity with a child, regardless of local laws or purported consent;
- abuse of authority, trust, influence or power;
- bullying, intimidation, humiliating or degrading behaviour;
- emotional, psychological, physical or financial abuse;
- neglect or the deliberate withholding of care, support or assistance;
- discriminatory abuse or harassment;
- retaliation against complainants, witnesses or persons involved in safeguarding processes;
- inappropriate physical contact;
- unauthorised sharing of personal information, images, stories or confidential records;
- using exploitative, degrading, discriminatory or sexually suggestive language, images or communications;
- engaging in unlawful conduct involving vulnerable people; and
- knowingly failing to report safeguarding concerns, incidents or suspected breaches of this policy.

Any breach of this policy may result in disciplinary action, termination of employment, volunteer engagement, contractual arrangements, partnership agreements or other appropriate action, including referral to relevant authorities where required.

8.0 PROCEDURE STATEMENT

Safeguarding Risk Management

Our Rainbow House will take reasonable steps to identify, assess, manage and monitor safeguarding risks associated with its programs, activities, operations and partnerships.

This includes:

- incorporating safeguarding considerations into project planning, implementation, monitoring and evaluation processes;
- assessing safeguarding risks associated with new activities, programs and partnerships;
- implementing risk mitigation measures appropriate to the level of risk identified;
- monitoring safeguarding risks throughout the life of programs and partnerships; and
- reviewing safeguarding risks and controls as part of organisational risk management processes.

Partner Safeguarding

Our Rainbow House recognises that safeguarding risks may arise through partnerships and third-party relationships.

Where appropriate, Our Rainbow House will:

- undertake safeguarding due diligence of partner organisations;
- communicate safeguarding expectations and requirements to partners;
- incorporate safeguarding obligations into partnership agreements and funding arrangements;
- support partners to strengthen safeguarding capacity where appropriate; and
- monitor compliance with agreed safeguarding obligations.

Safe Recruitment and Screening

Our Rainbow House is committed to safe recruitment and screening practices designed to reduce the risk of harm to vulnerable people.

As appropriate to the role, recruitment processes may include:

- position descriptions outlining safeguarding responsibilities;
- identity verification;
- referee checks;
- criminal history or police clearance checks;
- safeguarding-related interview questions;
- safeguarding declarations; and
- safeguarding induction and training requirements.

No person will be engaged where they present an unacceptable safeguarding risk.

Training and Awareness

Our Rainbow House will provide safeguarding information, training and awareness activities appropriate to the roles and responsibilities of representatives.

This may include:

- induction training;
- refresher training;
- safeguarding and PSEAH awareness activities;
- reporting obligations;
- expected standards of behaviour; and
- partner and community safeguarding awareness activities.

Safeguarding information will be communicated in ways that are accessible, culturally appropriate and understandable to relevant stakeholders.

Reporting Safeguarding Concerns

All representatives of Our Rainbow House must promptly report any safeguarding concern, incident, allegation, disclosure or suspicion of exploitation, abuse, harassment, neglect or other safeguarding risk.

Where there is an immediate risk of harm, reasonable steps must be taken to protect affected persons and emergency services or relevant authorities should be contacted where appropriate.

Reports may be made by:

- staff;
- volunteers;
- board members;
- partner organisations;
- beneficiaries;
- community members; or
- any other person with a safeguarding concern.

Reports can be made to:

- Director Alison Ray - phone: +61 407 040 251 or email to alisonjray@ourrainbowhouse.com.au
- Australian office: admin@ourrainbowhouse.org.au

- Chairperson: chair@ourrainbowhouse.org.au
- Project Co-ordinator – phone: +260 971 594 160 or email to orh-projectassistant@live.com or placed in their letter box/ pigeonhole

All reports will then be directed to a designated Safeguarding Focal Person, to ensure the matter is dealt with appropriately, as per this policy and legal requirements.

Concerns involving the Director must be reported directly to the Chairperson or another Board member. Failure to report known or suspected safeguarding concerns may constitute a breach of this policy.

To report directly to the appropriate authorities contact:

AUSTRALIA

Phone 000 if it's an emergency or if you believe a person is in immediate danger or in a life-threatening situation.

If there is an allegation or suspicion of exploitation, abuse or harassment, these matters can be reported to your state police:

- contact your local police **131 444**
- contact Crime Stoppers on **1800 333 000**
- Or Alternative Reporting Options | [QPS \(police.qld.gov.au\)](https://police.qld.gov.au)

Concerns about people engaging in sex tourism, sex trafficking and child pornography should be reported to the Australian Federal Police Transnational Sexual Exploitation and Trafficking Team (TSETT):

- using the online form found at https://forms.afp.gov.au/online_forms/cst_form.
- or by email to tsett@afp.gov.au

ZAMBIA

Phone 999 if it's an emergency or if you believe a person is in immediate danger or in a life-threatening situation.

If there is an allegation or suspicion of exploitation, abuse or harassment, these matters can be reported to the local police.

- Lusaka Province Police Hotline: call **999**
- Visit your local police station, which will have a Victim Support Unit (VSU).

Responding to Safeguarding Concerns

All safeguarding concerns will be taken seriously and responded to promptly, fairly and appropriately.

Responses will be guided by the following principles:

- safety and wellbeing of affected persons;
- survivor-centred practice;
- confidentiality;
- procedural fairness;
- cultural sensitivity;
- non-retaliation; and
- compliance with legal and regulatory obligations.

Appropriate actions may include:

- immediate risk management measures;
- referral to external support services;
- internal assessment or investigation;
- referral to relevant authorities;
- disciplinary action; or
- organisational corrective actions.

Investigations

Where appropriate, Our Rainbow House may undertake an assessment or investigation of safeguarding concerns.

Investigations will:

- be conducted by appropriately authorised persons;
- be proportionate to the nature and seriousness of the allegation;
- maintain confidentiality where possible;
- observe procedural fairness;
- seek to minimise further harm to affected persons; and
- be documented appropriately.

Nothing in this policy prevents matters being referred to law enforcement, child protection authorities, regulators or other relevant agencies.

All investigations will be conducted as per the *Our Rainbow House Complaints Handling Policy and Procedure* and/or *Whistleblowing Policy and Procedure* as appropriate.

Confidentiality and Recordkeeping

Safeguarding information will be managed confidentially and shared only with those who have a legitimate need to know.

Records relating to safeguarding concerns, investigations and outcomes will be:

- documented accurately;
- stored securely;
- protected from unauthorised access; and
- retained in accordance with legal and organisational requirements

Support and Referrals

Our Rainbow House recognises the potential impact of safeguarding incidents on individuals and communities.

Where appropriate and practicable, affected persons will be offered information, support and referral options, which may include:

- medical services;
- psychosocial support;
- counselling services;
- legal assistance; or
- other specialised support services.

Support services in Australia can be found at:

- Sexual Assault Helpline **1800 010 120**
- 1800 Respect National Helpline: **1800 737 732**
- Men's Referral Service: **1300 766 491**
- Lifeline (24-hour Crisis Line): **131 114**
- Victims of Crime Helpline: **1800 819 817**

Lifeline Zambia provides confidential phone/text/web-based counselling services for women and girls who experience sexual and gender-based violence:

- <https://clzambia.org>
- Call or SMS: **933**

Support will be provided in a manner that respects the dignity, wishes, safety and informed choices of the individual.

Protection from Retaliation

Our Rainbow House prohibits retaliation against any person who, in good faith:

- raises a safeguarding concern;
- makes a complaint;
- provides information;
- participates in an investigation; or
- supports another person to report a concern.

Any act of retaliation may result in disciplinary action.

Monitoring and Continuous Improvement

Our Rainbow House will regularly review safeguarding systems, practices and risks to support continuous improvement.

This may include:

- monitoring safeguarding incidents and trends;
- reviewing safeguarding controls and mitigation measures;
- obtaining feedback from stakeholders;
- reviewing safeguarding policies and procedures; and
- implementing improvements identified through audits, investigations, evaluations or lessons learned.

9.0 REVIEW

Date of next review: 20/07/2028 or after any serious incident, to determine if the policy and associated procedure has been effective.