

Flinders University Modern Slavery Statement

2024 Financial Year



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About Flinders University

Established in 1966, we are building on almost 60 years of achievement with a vision to be internationally recognised as a world leader in research, an innovator in contemporary education, and the source of Australia's most enterprising graduates.

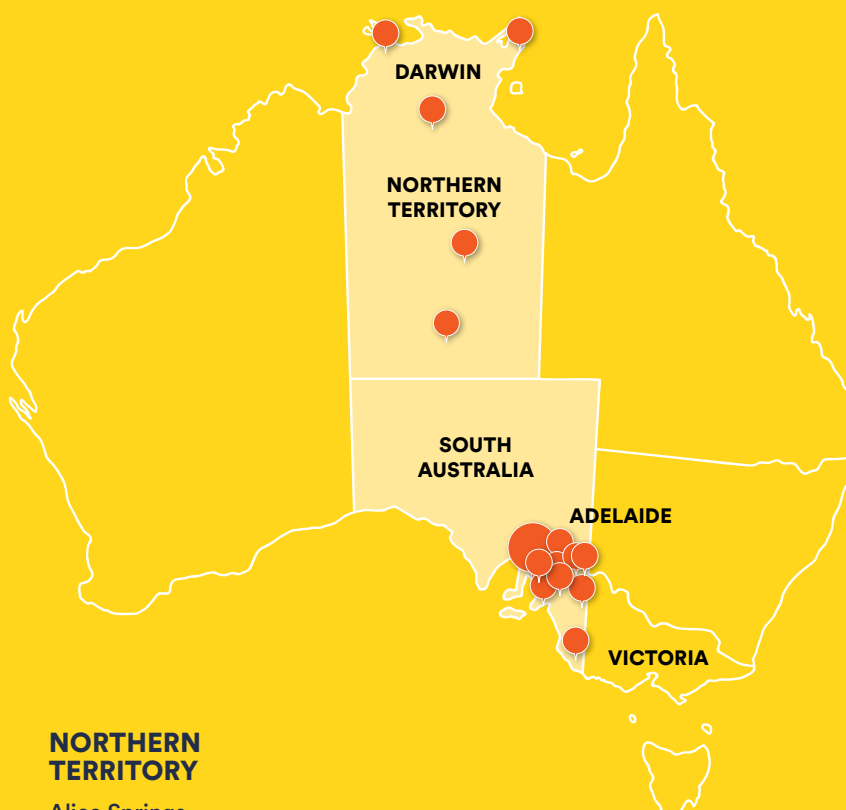
With core values of integrity, courage, innovation and excellence, and an underlying ethos of being student centred, Flinders University has a bold mission of changing lives and changing the world.

As we enter an era of disruptive change and remarkable technological innovation, Flinders is well prepared for this unpredictable, exciting future.

Our strong network of external links keeps our work dynamic, enabling us to connect across barriers to create enterprising solutions for the future, to make a difference by changing lives and, ultimately, the world.

Geographic Footprint

Headquartered in Adelaide, South Australia, we offer exceptional teaching on campus and online, with a physical presence extending across multiple locations.



ADELAIDE

Bedford Park
Tonsley
Festival Plaza, City

SOUTH AUSTRALIA

Barossa
Berri
Mount Gambier
Murray Bridge
Renmark
Victor Harbor

NORTHERN TERRITORY

Alice Springs
Darwin
Katherine
Nhulunbuy
Tennant Creek

PART A

Reporting Entity

This is Flinders University's modern slavery statement pursuant to the Modern Slavery Act 2018 (Cth) (the Act). This Statement sets out the actions taken by Flinders to identify, assess, and address modern slavery risks across our operations and supply chains in the financial year period 1 January 2024 to 31 December 2024.

Flinders University (ABN 65 542 596 200) is a reporting entity for the purposes of the Act as it is an entity that carries on business in Australia with a consolidated revenue of over \$A100 million, during the reporting period.

Flinders is a statutory body established under section 3 of the Flinders University Act 1966 (SA). Our statutory functions are outlined in section 4 of the Act. Under the Act, the Council is the governing body of the University (s5(2)), with the Vice Chancellor the principal academic and Chief Executive Officer (s16(1a)). Flinders is committed to eliminating all forms of slavery and human trafficking from our operations and supply chain, in keeping with our mission "to change lives and change the world", and supported by our "Making a Difference – the 2025 Agenda".

Flinders has been working closely with the Australasian University Procurement Network (AUPN), as a member of the University Anti-slavery Working Group, where a sector wide effort to analyse, identify, educate and address modern slavery within supply chains has been progressing.

Flinders' strategic plan, ***Making a Difference: The 2025 Agenda***, outlines the University's vision and mission for the coming years. Flinders University's vision is to become internationally recognised as a world leader in research, an innovator in contemporary education, and the source of Australia's most enterprising graduates.

Our mission: to change lives and change the world.

The plan is based on our four pillars:
People and culture
Research
Education
Engagement and impact.

THE 2025 AGENDA

Making a Difference

Released in May 2016, a bold strategic plan focused on our People and Culture, Research, Education and Engagement and Impact with the aim of elevating Flinders into the top ten Australian universities by 2025.



PART B

Structure, Operations & Supply Chains

Flinders University is a public university headquartered in South Australia with a footprint that extends throughout regional and remote Australia.

Ranked in the top two per cent of world universities, Flinders is globally focused and locally engaged with a reputation for innovative research, excellence in contemporary teaching and learning, and exceptional student experience.

Our main campus is located at Bedford Park in Adelaide. Other campuses include the high-tech Tonsley campus and our Flinders City Campus at Festival Plaza in the heart of the city. Our Northern Territory Medical Program supports students to complete a Flinders Doctor of Medicine in Darwin through facilities in Alice Springs, Katherine and Nhulunbuy. Internationally, we deliver joint courses with leading universities in China, Hong Kong, Malaysia, Singapore, and Indonesia.

Flinders University's research strengths include biomedical and clinical sciences, culture, policy and society, health and human behaviour, molecular science and technology, defence, engineering, water and environment.

We offer undergraduate and postgraduate courses for some 25,100 students and host around 6,400 international students from approximately 90 countries. Our main campus includes on-site accommodation for 560 students.

Flinders employs 2479 full time equivalent staff across all campuses, with 1097 academic staff and 1382 professional staff as at 31 December 2024. Staff have the ability to join a union, with the predominant union representing staff being the National Tertiary Education Union (NTEU). The employment conditions of Flinders staff are covered by an Enterprise Agreement for the period 2023 to 2026.

Flinders University has a diverse Supply Chain that is common across Australasian Universities. Flinders has a spend profile that is distributed across a broad range of industries. The primary categories of spend for the University include:

- Construction and Minor Works
- Information Technology, including hardware, software and advisory
- Facilities Management, including cleaning, HVAC, and maintenance
- Professional Services, including advisory, and
- Laboratory Equipment and Supplies.

The University has established contracts for many of these categories with first tier suppliers, many of whom are reporting entities under the Modern Slavery Act. A significant percentage of Flinders spend, however, is with smaller non-reporting entities.

The majority of Flinders spend is with suppliers based in Australia (>90%), with spend across a broad range of industry sectors. Our major international spend in 2024 was with the United States of America, the United Kingdom, India, China, Singapore Canada, and Pakistan. Overall, 4416 suppliers were used in 2024, across 73 countries (see table below).

Flinders also has a controlling position with five Controlled Entities:

- FCD Health Ltd
- Flinders Partners Pty Ltd
- Flinders University Sports and Fitness Inc.
- Flinders Academy Pty Ltd
- Aged Care Research & Industry Innovation Australia Limited.

Flinders Partners Pty Ltd and Aged Care Research & Industry Innovation Australia Limited's procurement activities are conducted by the University and in accordance with the University's operations and policy framework. FCD Health Ltd, Flinders University Sports and Fitness Inc and Flinders Academy Pty Ltd operate independently of the University.

Top 10 Countries by Spend	% of 2022 Spend	Level of Vulnerability to Modern Slavery (%)*
Australia	90.3%	7
United States	2.3%	25
India	1.6%	56
China	1.1%	46
Singapore	0.8%	24
United Kingdom	0.7%	14
Pakistan	0.7%	80
Nepal	0.4%	45
Canada	0.3%	11
Ireland	0.3%	9

* Source – 2023 Global Slavery Index

PART C

Risks of Modern Slavery Practices in the Operations & Supply Chains of the University and Subsidiaries

The supply chain for Flinders University, together with the entities it owns and controls, reflects a similar risk profile to that of most Universities. We purchase goods and services across a number of the high-risk groups, especially IT hardware (laptops, computers and mobile phones), laboratory supplies, construction and cleaning.

The spend data of Flinders University for 2024 has been assessed through the AUPN Anti-Slavery Dashboard. Our primary high risk spend categories are:

- Desktop Hardware
- Commercial Cleaning
- Medical & Laboratory Supplies
- Scientific Equipment
- Software
- Construction & Building Repair

Our supply chain for these high-risk categories primarily involves first tier, Australian based suppliers. In many of these cases, the Australian supplier is merely an agent for the product sold. Our work in future reporting periods will be to assist our suppliers in understanding their supply chain and to educate them on how to identify and address areas of modern slavery risks.

Flinders University does have a small spend with High or Very High Risk Countries. This spend is typically very small amounts related to low risk categories, and in many cases with contracts in place. The majority of this spend in High or Very High Risk Countries relates to student recruitment or student refunds.

Top Countries by Risk		% of University spend	Level of Vulnerability to Modern Slavery (%)*
Very High	Nigeria	0.043%	76
	Pakistan	0.066%	80
	Papua New Guinea	0.001%	79
High	Bangladesh	0.065%	58
	Cambodia	0.009%	58
	Colombia	0.007%	51
	Egypt	0.001%	59
	Guinea	0.004%	66
	India	1.612%	56
	Kenya	0.045%	66
	Laos	0.013%	52
	Mongolia	0.002%	50
	Philippines	0.015%	66
	Saudi Arabia	0.023%	53
	Sierra Leone	0.006%	55
	South Africa	0.020%	52
	Sri Lanka	0.164%	56
	Timor-Leste	0.003%	51
	Turkey	0.008%	51

* Source – 2023 Global Slavery Index



PART D

Actions taken to assess and address risks

Prior to, and during the 2024 financial year, Flinders has been operating a procurement framework that incorporates Modern Slavery assessment into the decision-making process, as part of a broader Social Procurement Framework.

Previously, our Modern Slavery assessment has focused on higher value or high-risk processes, where Request for Proposal/Tender processes have incorporated response schedule questions on our suppliers' approach to Modern Slavery. These questions have been expanded and refined through experience and have been supported by the incorporation of Modern Slavery into the evaluation process. This has been achieved through a scored criteria, as part of the Social Procurement element.

2024 saw continued education on the Procurement Policy for Flinders, which was released in 2023. This new policy includes a further focus on Procurement Principles, including Ethical, Sustainable and Social Responsibility principles of which our requirements and obligations under the Modern Slavery Act 2018 are a key component.

As well as our internal efforts, Flinders as a member of the AUPN has been working to help develop a University sector wide initiative to educate and inform ourselves and our suppliers, to identify high risk areas within our supply-chains, and to take collaborative steps to reduce modern slavery. This is based on our belief that effective change in this area requires a collaborative effort, rather than disparate and reactionary attempts. As part of our efforts in this area,

Flinders has been one of the Universities actively participating in the AUPN's Anti-Slavery Working Group.

During 2024, the AUPN and the Anti-Slavery Working Group commenced a sector-wide program of targeted Supplier Assessments in the high-risk categories of Scientific Equipment and Laboratory Supplies. Flinders contributed to this process by sending Supplier Assessment Questionnaires (SAQ's) to nominated vendors. The SAQ process identified that 33% of respondents had not mapped or assessed risks across their supply chain, and 50% do not conduct supplier training. To improve this, 5 suppliers have agreed to participate in a pilot remediation plan, which will improve their understanding and compliance in this area.

As part of the sector initiative, we worked to operationalise the Anti-Slavery portal and to maximise its benefits. Ways to improve data presentation and risk reporting were a focus, in an effort to improve visibility across the sector. Guidance for grievance mechanisms and remediation, along with Response Plans for media alerts were refined for individual universities and the broader sector.

During 2024, Flinders University partnered up with ACRATH and University of South Australia to develop a nation-wide Modern Slavery awareness training project called Educating for Change. This project has been federally funded under the Attorney General's National Action Plan to Combat Modern Slavery 2020–2025, to develop micro-credentials for university students and staff across Australia. This initiative seeks to address the underlying drivers of modern slavery and empower victims and survivors by raising awareness within the higher education sector. The program will be made available in 2025.



PART E

Assessment of the effectiveness of actions

The 2024 Reporting period has been a period of continual improvement towards removing modern slavery from our operations and supply chain. Key steps have been introduced and refined, and future actions have been identified, but it is recognised that at this stage we are still early in the process, for both Flinders and the entities we own and control.

From our engagement with Industry through procurement processes, it has been pleasing to see the increased awareness and substance in responses to our modern slavery questions. Initially responses were limited, and for non-reporting entities, often non-existent, however the standard of responses from reporting and non-reporting entities has continued to improve significantly during the 2024 reporting period.

The implementation of better reporting systems has provided us with greater visibility of modern slavery and human rights risks across our supply chain. It has provided the procurement team with the ability to identify our high risk spend at a supplier level. Continued improvement in the use of the portal and data inputs in 2024 will further improve the effectiveness of our efforts.

Similarly engagement with the broader AUPN community through the Anti-Slavery Working Group has provided an invaluable opportunity for Flinders to seek input and counsel from other Universities. The development of the Anti-Slavery portal, the sectors' Supplier Assessment program, as well as the grievance mechanisms and remediation guidelines, has provided Flinders with an opportunity to achieve outcomes well ahead of where we would otherwise have been if we were operating independently.

Our capability in this area has improved since the last reporting period, with improved data available and processes available. The introduction of the ACRATH training modules, along with other initiatives will further improve our capability into the next reporting period.



PART F

Consultation

Consultation with local retailers

Within the University campus, Flinders has worked closely with our on-site food and beverage retailers to ensure they reflect similar values to the University, with respect to both Modern Slavery and Sustainability. As a result, all coffee sold on the Flinders campus has been certified Fair-Trade since 2016, with many other foods sold also reflecting the higher ethical standards required.

Consultation with controlled entities

Flinders has a controlling position with five entities:

- FCD Health Ltd
- Flinders Partners Pty Ltd
- Flinders University Sports and Fitness Inc.
- Flinders Academy Pty Ltd
- Aged Care Research & Industry Innovation Australia Limited

Flinders Partners Pty Ltd and Aged Care Research & Industry Innovation Australia Limited's procurement activities are conducted by the University and in accordance with the University's operations and policy framework. FCD Health Ltd, Flinders University Sports and Fitness Inc and Flinders Academy Pty Ltd all operate independently of the University.

Flinders also has a reporting level ownership, but not control, of the Flinders Reproductive Medicine Pty Ltd, trading as Flinders Fertility.

We will continue to work with these entities to increase their awareness and improve their management of modern slavery within their operations and supply chains.



PART G

Other information

As Flinders enters its next reporting period, we will continue to develop and improve our approach to Modern Slavery.

Our focus for the 2025 reporting period will be on ensuring our spend data analysis continues to improve, to allow for more effective risk analysis of the University's spend.

We will also continue to increase the awareness of Modern Slavery risks within our operations and our supply chains to our staff and stakeholders, to ensure that it is suitably reflected in the decision-making process for University staff.

THIS STATEMENT WAS APPROVED BY THE UNIVERSITY COUNCIL OF FLINDERS UNIVERSITY ON 22 May 2025.



Professor Colin Stirling

Professor Colin Stirling
President & Vice Chancellor
22 May 2025





Acknowledgment of Country

Flinders University acknowledges the Traditional Owners of the lands on which its campuses are located. These are the Traditional Lands of the Arrernte, Dagoman, First Nations of the South East, First Peoples of the River Murray & Mallee region, Jawoyn, Kaurna, Larrakia, Ngadjuri, Ngarrindjeri, Ramindjeri, Warumungu, Wardaman and Yolngu people. We honour their Elders and Custodians past, present and emerging.

Flinders.edu.au

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