



Flinders University Modern Slavery Statement

2022 Financial Year



Contents

PART A – Reporting entity	4
PART B – Structure, operations & supply chains	5
PART C – Risks of modern slavery practices in the operations & supply chains of the University and subsidiaries	6
PART D – Actions taken to assess and address risks	7
PART E – Assessment of the effectiveness of actions	8
PART F – Consultation	9
PART G – Other information	10

About Flinders University

Established in 1966, we are building on 50 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.

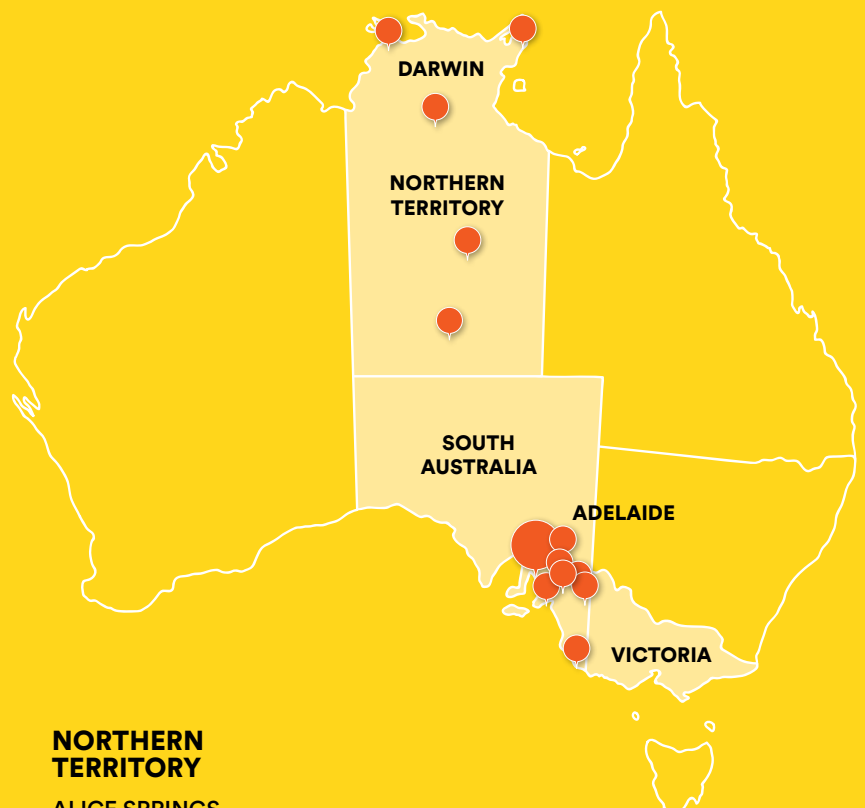
With core values of integrity, courage, innovation and excellence, and an underlying ethos of being student centred, Flinders University has a bold mission of changing lives and changing the world.

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
VICTORIA SQUARE

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 2022 to 31 December 2022.

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 Australian University Procurement Network (AUPN), as a member of the Modern 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 Victoria Square campus 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 22,800 students and host around 5,000 international students from more than 100 countries. Our main campus includes on-site accommodation for 560 students.

Flinders employs 2327 full time equivalent staff across all campuses, with 1050 academic staff and 1277 professional staff as at 31 December 2021. 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 2019 to 2022.

Flinders University has a diverse Supply Chain that is common across Australian 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 (>92%), with spend across a broad range of industry sectors. Our major international spend in 2022 was with the United States of America, India, Singapore, Germany, the United Kingdom, China and Ireland. Overall, 3080 suppliers were used over 2022, across 68 countries (see table below).

Flinders also has a controlling position with four Controlled Entities:

- FCD Health Ltd
- Flinders Partners Pty Ltd
- Flinders University Sports and Fitness Inc.
- Flinders Academy Pty Ltd

Flinders Partners Pty Ltd'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 ARIIA operate independently of the University.

Country	% of 2022 Spend	Country Vulnerability to Modern Slavery (Overall weighted ave) *	
Australia	92.5%	4.3	Low
United States	2.2%	15.9	Low
India	1.5%	55.5	High
Singapore	0.8%	13.4	Low
Germany	0.6%	10.4	Low
United Kingdom	0.6%	11.1	Low
China	0.3%	50.6	High
Ireland	0.3%	10.4	Low
Canada	0.2%	10.2	Low
Hong Kong	0.2%	24.7	Medium

* Based on Global Slavery Index 2018

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), clothing and apparel, construction and cleaning.

The spend data of Flinders University for 2022 has been assessed through the FRDM portal. Our primary high risk spend categories are:

- Desktop Hardware
- Cleaning
- Laboratory Supplies
- Research Equipment
- Food & Beverage
- Clothing & Apparel

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.

Modern slavery risks also have the potential to exist within the operations of Flinders University. To combat this, future reporting periods will be utilised to review and manage any modern slavery risks related to our research and education activities, both domestically and internationally.



PART D

Actions taken to assess and address risks

Prior to, and during the 2022 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.

Initially, this 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.

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 Modern Slavery Working Group.

2022 saw the implementation of the FRDM portal into Flinders and 34 other Australian Universities, following its selection in 2021. FRDM is a USA based supply chain technology company that will algorithmically identify modern slavery risks throughout universities' supply chains, enabling each university or the sector collectively to make informed decisions and take action to address modern slavery risk. The 35 participating universities collated, categorised and uploaded \$16bn of procurement spend covering 18 months into FRDM.

As part of the sector initiative, we worked with FRDM to operationalise the FRDM portal and to maximise its benefits. Ways to improve supplier onboarding and assessments through FRDM were assessed, in an effort to achieve consistency across the sector. Guidance for grievance mechanisms and remediation, along with Response Plans for media alerts were developed for individual universities and the broader sector.

In addition to FRDM, the Cleaning Accountability Framework (CAF) delivered on-line training to Flinders and the sector, on the risks of Modern Slavery in the Australian cleaning industry, with a pilot program undertaken at 3 universities. Discussions were also held with Electronics Watch to investigate opportunities for the sector to address risks in the high-risk Information Technology industry.



PART E

Assessment of the effectiveness of actions

The 2022 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 2022 reporting period.

The implementation of FRDM 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 and sub-supplier level. Continued improvement in the use of the portal and data inputs in 2023 will further improve the effectiveness of our efforts.

Similarly engagement with the broader AUPN community through the Modern Slavery Working Group has provided an invaluable opportunity for Flinders to seek input and counsel from other Universities. The development of the FRDM portal, the response plans for media alerts 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 operating independently.



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.

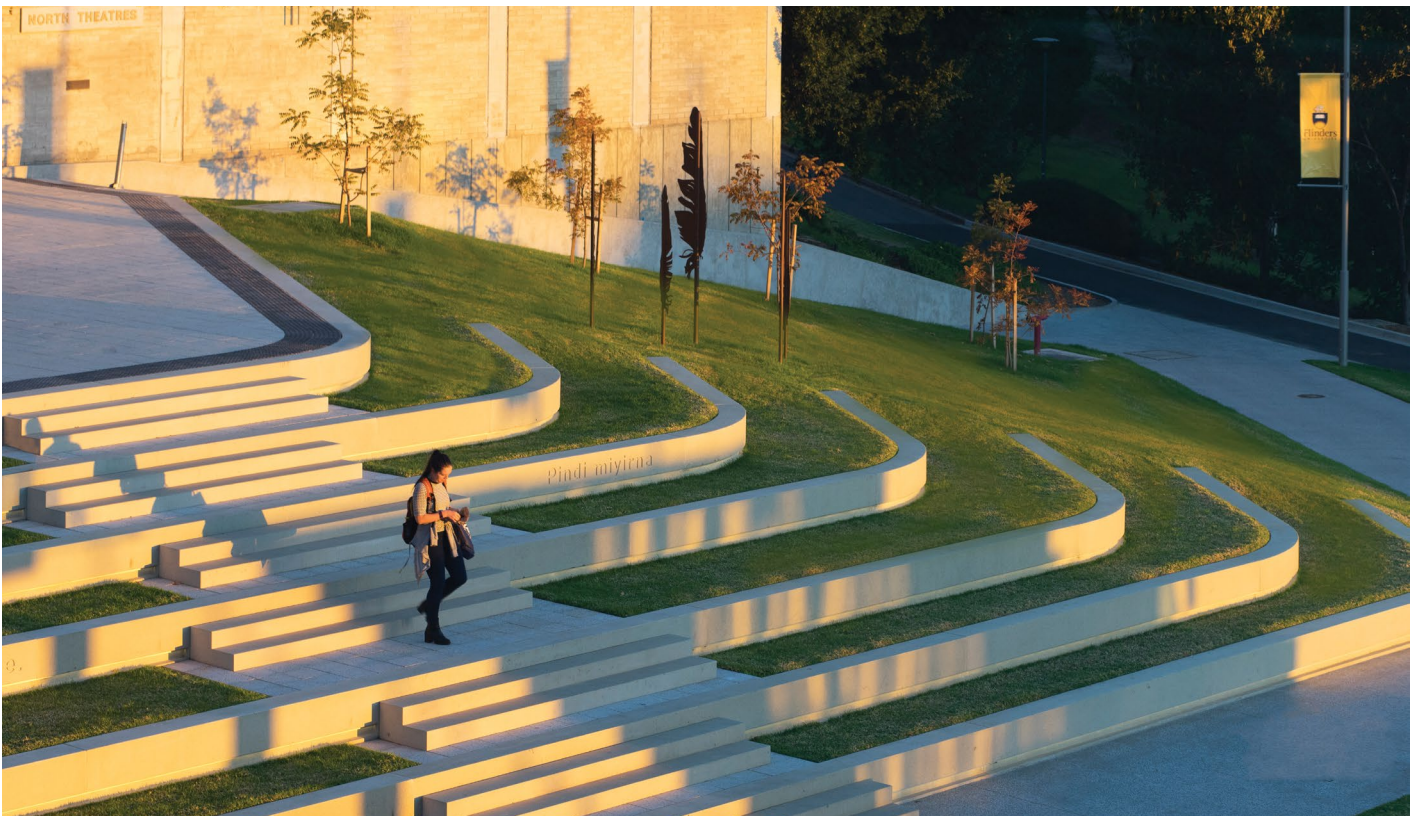
Flinders also has a reporting level ownership, but not control, of the Flinders Reproductive Medicine Pty Ltd, trading as Flinders Fertility. We will continue to work with these entities to increase their awareness and improve their management of modern slavery within their operations and supply chains.

CONSULTATION WITH CONTROLLED ENTITIES

Flinders has a controlling position with four entities:

- FCD Health Ltd
- Flinders Partners Pty Ltd
- Flinders University Sports and Fitness Inc.
- Flinders Academy Pty Ltd

Flinders Partners Pty Ltd's procurement activities are conducted by the University and in accordance with the University's operations and policy framework. FCD Health Ltd and Flinders University Sports and Fitness Inc both operate independently of the University.



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 2023 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 11 June 2023.



Professor Colin Stirling

Professor Colin Stirling
President & Vice Chancellor
11 June 2023





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, Kurna, Larrakia, Ngadjuri, Ngarrindjeri, Ramindjeri, Warumungu, Wardaman and Yolngu people. We honour their Elders and Custodians past, present and emerging.

[Flinders.edu.au](https://www.flinders.edu.au)