

Foreign Interactions Policy

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1. Purpose

- a. Interactions with foreign individuals, groups or entities are a welcome and important part of University life and integral to the success of Flinders University's teaching, learning and research activities.
- b. However, with foreign interactions comes the risk of foreign interference as universities can become targets for foreign actors seeking to act against Australia's national interest. To this end, foreign actors may seek to interfere in the university sector through:
 - i. efforts to alter or direct the research agenda
 - ii. economic pressure
 - iii. solicitation and recruitment of researchers and academic staff
 - iv. cyber intrusions.
- c. This policy articulates how the University assesses and manages the risks associated with its foreign interactions.

2. Scope

This policy applies to both informal and formal foreign interactions related to University business and applies to all members of the University community.

3. Definitions

Foreign influence

When governments, including Australia's, try to influence deliberations on issues of importance to them. Foreign influence activities, when conducted in an open and transparent manner, are a normal aspect of international relations and diplomacy and can contribute positively to public debate.¹

¹ p.5, 'Foreign interference' versus 'foreign influence', [Guidelines to counter foreign interference in the Australian university sector](#), November 2021

Foreign interference	Occurs when activities are carried out by, or on behalf of a foreign actor, which are coercive, covert, deceptive or corrupting and are contrary to Australia's sovereignty, values and national interests. ¹
University community	<p>For the purposes of this policy, University community includes, to the extent they are involved in University business:</p> <ul style="list-style-type: none"> • enrolled Flinders students, including cross-institutional students and students on exchange from another institution • employees and exchange staff • employees of controlled entities, Centres and Institutes, and affiliated clubs and associations • contractors and consultants performing work on University sites or on behalf of the University • visiting academics or persons with academic status • the Council and its committees • any volunteer in the workplace and study environment.

4. Policy statement

The University assesses and manages the potential risks and any legislative compliance obligations associated with its foreign interactions, including foreign interference, foreign influence, defence export controls and autonomous sanctions, by:

- building awareness and capacity in identifying potential exposures to and instances of foreign interference amongst members of the University community, and the types of behaviours that should be reported e.g. via training and awareness activities
- undertaking due diligence, proportionate to the risk of the activity, when engaging in partnerships, agreements or other forms of arrangement with a foreign partner to assess and address any potential risks
- ensuring agreements or other forms of arrangements with foreign partners including international engagements are robust and address potential risks
- identifying research that may require additional due diligence and/or oversight due to the nature of the research, potential downstream applications, and/or the type of partner/ship
- implementing cyber security strategies and controls, while also requiring all members of the University community to employ reasonable efforts to protect the Flinders digital environment, assets and digital identities from theft, exposure, damage or unauthorised access, including from foreign interference, in accordance with the [Digital Security Policy](#) and [Acceptable Use of Digital Assets Policy](#).

5. Assessing and managing the risk

- Anyone engaging in any activity or partnership on behalf of or with a foreign government, foreign university, foreign business or any other foreign organisation or entity as part of their University business must evaluate the proposed activity or partnership for the risk of foreign interference, foreign influence and foreign bribery and/or statutory reporting or regulatory obligations.

- b. The University's [Foreign Interactions](#) webpage provides information on the various legislation, definitions, due diligence and reporting obligations relevant to foreign interactions to support members of the University community to manage the potential risks arising from their University business-related foreign interactions, and to ensure compliance with legislation and the University's policy.
- c. In accordance with the [Conflict of Interest Policy](#) individuals must declare any of the following using the [Declaration of foreign and other affiliations form](#):
 - i. any foreign financial support (cash or in kind) for research and/or any other University-related activities
 - ii. current or past associations or affiliations with a foreign-sponsored talent program
 - iii. current associations or affiliations with any foreign university, government, political party, state-owned enterprise, military and/or police organisation.

6. Reporting

The University will put in place processes to ensure compliance with its statutory reporting obligations including under the *Foreign Influence Transparency Scheme Act 2018*, *Australia's Foreign Relations (State and Territory Arrangements) Act 2020*, *Autonomous Sanctions Act 2011* and *Defence Trade Controls Act 2012*.

7. Foreign Interference

- a. If after using the Due Diligence Tool the risk of foreign interference is identified in relation to any University business, advice must be sought from Legal Services who will assess the risk and consider what mitigation measures will be required including:
 - i. requesting further due diligence of the activity or partner be undertaken
 - ii. determining that further contractual protections are necessary
 - iii. recommending that engaging in the activity or with the partner be reconsidered
 - iv. requiring any other action to be undertaken appropriate to the risk including, where appropriate, recommending that the University not proceed with the proposed arrangements (after escalation to the relevant Vice-President and Executive Dean / Portfolio Head and the General Counsel)
- b. Anyone who is aware of or reasonably suspects that foreign interference is occurring in relation to University activities must immediately lodge a report as follows:
 - i. for staff, use the Service One [Report actual or suspected foreign interference form](#)
 - ii. for students, see the [Foreign interference in student activities](#) webpage and use the [Formal Complaints Form](#).

8. Privacy

Information collected under this policy will be stored, used and dealt with in accordance with the University's [Privacy Policy](#), including to manage compliance with this and other related policies and procedures, internal business and administrative purposes such as risk management and any other purpose contemplated by the University's Privacy Policy, and may be shared within the University or with third parties for those purposes.

9. Authorities

**General Counsel and
University Secretary**

Approve the processes for assessing and managing the risks associated with the University's foreign interactions and the content of the Foreign interactions website

10. Related resources

[Foreign interactions webpage](#)

[Digital Security Policy](#)

[Acceptable Use of Digital Assets Policy](#)

[Risk Management Policy](#)

[Privacy Policy](#)

[Conflict of Interest Policy](#)

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* Unless otherwise indicated, this policy or procedures still apply beyond the review date.

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