



8 March 2019

Human Rights and Technology Project
Australian Human Rights Commission
GPO Box 5218
SYDNEY NSW 2001

Via email: tech@humanrights.gov.au

Dear Sir/Madam

Artificial Intelligence: Governance and Leadership

Chartered Accountants Australia and New Zealand welcomes the opportunity to provide feedback to the Australian Human Rights Commission on the Artificial Intelligence: Governance and Leadership white paper. Appendix A includes our detailed submission and Appendix B provides more information about Chartered Accountants Australia and New Zealand (CA ANZ).

We support the Australian Human Rights Commission and the World Economic Forum working together to explore models of governance and leadership in artificial intelligence (AI) in Australia. We recognise the enormous capacity for social good and social harm that AI holds and acknowledge that our challenge as a nation is to ensure that we foster innovation while protecting human rights.

We highlight the main points for consideration from our October 2018 [submission to the Australian Human Rights Commission on the Human Rights and Technology Issues Paper](#):

- We recommend that collaboration within society (business, regulators, individuals and professions) will be needed to facilitate confidence and trust in new technologies with government playing a pivotal role in facilitating this collaboration.
- We consider there would be value in the establishment of a Responsible Innovation Organisation. To improve global alignment in this space, we suggest that such an organisation should also collaborate with other similar bodies globally.

Should you have any queries concerning the matters discussed above or wish to discuss them in further detail, please contact Karen McWilliams via email at karen.mcwilliams@charteredaccountantsanz.com or phone (612) 8078 5451.

Yours sincerely,

Simon Grant FCA
Group Executive
Advocacy & Professional Standing
Chartered Accountants Australia and
New Zealand

Karen McWilliams FCA
Business Reform Leader
Advocacy & Professional Standing
Chartered Accountants Australia and
New Zealand

Appendix A

A number of the points we raised in this submission, were include in our October 2018 [submission to the Australian Human Rights Commission on the Human Rights and Technology Issues Paper](#).

1. What should be the main goals of government regulation in the area of artificial intelligence?

Government regulation should not stifle innovation and development of artificial intelligence (AI), as this could result in companies developing AI migrating to a more accommodating jurisdiction. For this reason, we consider global agreement to be essential.

Further, we recommend that any legislation is principles-based and flexible to enable it to keep pace with the rapid changes in technology. We acknowledge that technology is rapidly changing and therefore identifying and responding to ethical challenges, including regulatory frameworks, will require a flexible and agile approach to enable updates to reflect evolving issues. There will be reliance on partnerships ranging from industry to non-profit organisations and academics. A collaborative multi-stakeholder approach is therefore encouraged as outputs will more likely be fit for purpose and widely adopted.

2. Considering how artificial intelligence is currently regulated and influenced in Australia:

a. What existing bodies play an important role in this area?

The Australian Computing Society have established an ethics committee. We also understand that Standards Australia are engaging with ISO around the development of standard for AI.

As mentioned in the white paper, the Institute for Electrical and Electronics Engineers (IEEE) has pre-existing codes of practice and ethical standards. Although the IEEE is a US based body, their international approach and expansive membership base (including many members based in Australia) is seen as influential in Australia and plays an important role in this area.

b. What are the gaps in the current regulatory system?

Whilst this is not necessarily a regulatory gap, we note that there would be value in setting some ethical boundaries around AI's development and use, even in a voluntary manner. We recommend consideration be given to identifying some of society's ethical boundaries around AI development and use in areas such as privacy, data ownership etc.

3. Would there be significant economic and/or social value for Australia in establishing a Responsible Innovation Organisation?

We consider there would be value in the establishment of a Responsible Innovation Organisation. To improve global alignment in this space, we suggest that such an organisation should also collaborate with other similar bodies globally.

4. Under what circumstances would a Responsible Innovation Organisation add value to your organisation directly?

Our members work in a diverse range of organisations, many of whom are or will be directly utilising AI technologies to add value to their businesses and clients. We consider ethical frameworks would be helpful to our members. Additionally, there may be a requirement for assurance to give transparency over algorithms and our members would be well placed to provide this service.

5. How should the business case for a Responsible Innovation Organisation be measured?

We don't have any specific suggestions in relation to this question.

6. If Australia had a Responsible Innovation Organisation:

a. What should be its overarching vision and core aims?

We suggest further consideration is given to the five core principles within the guiding set of principles released by the UK's House of Lords when considering an overarching vision and core aims for an Australian Responsible Innovation Organisation.

Appendix B

About Chartered Accountants Australia and New Zealand

Chartered Accountants Australia and New Zealand is a professional body comprised of over 120,000 diverse, talented and financially astute members who utilise their skills every day to make a difference for businesses the world over.

Members are known for their professional integrity, principled judgment, financial discipline and a forward-looking approach to business which contributes to the prosperity of our nations.

We focus on the education and lifelong learning of our members, and engage in advocacy and thought leadership in areas of public interest that impact the economy and domestic and international markets.

We are a member of the International Federation of Accountants, and are connected globally through the 800,000-strong Global Accounting Alliance and Chartered Accountants Worldwide which brings together leading Institutes in Australia, England and Wales, Ireland, New Zealand, Scotland and South Africa to support and promote over 320,000 Chartered Accountants in more than 180 countries.

We also have a strategic alliance with the Association of Chartered Certified Accountants. The alliance represents 788,000 current and next generation professional accountants across 181 countries and is one of the largest accounting alliances in the world providing the full range of accounting qualifications to students and business.