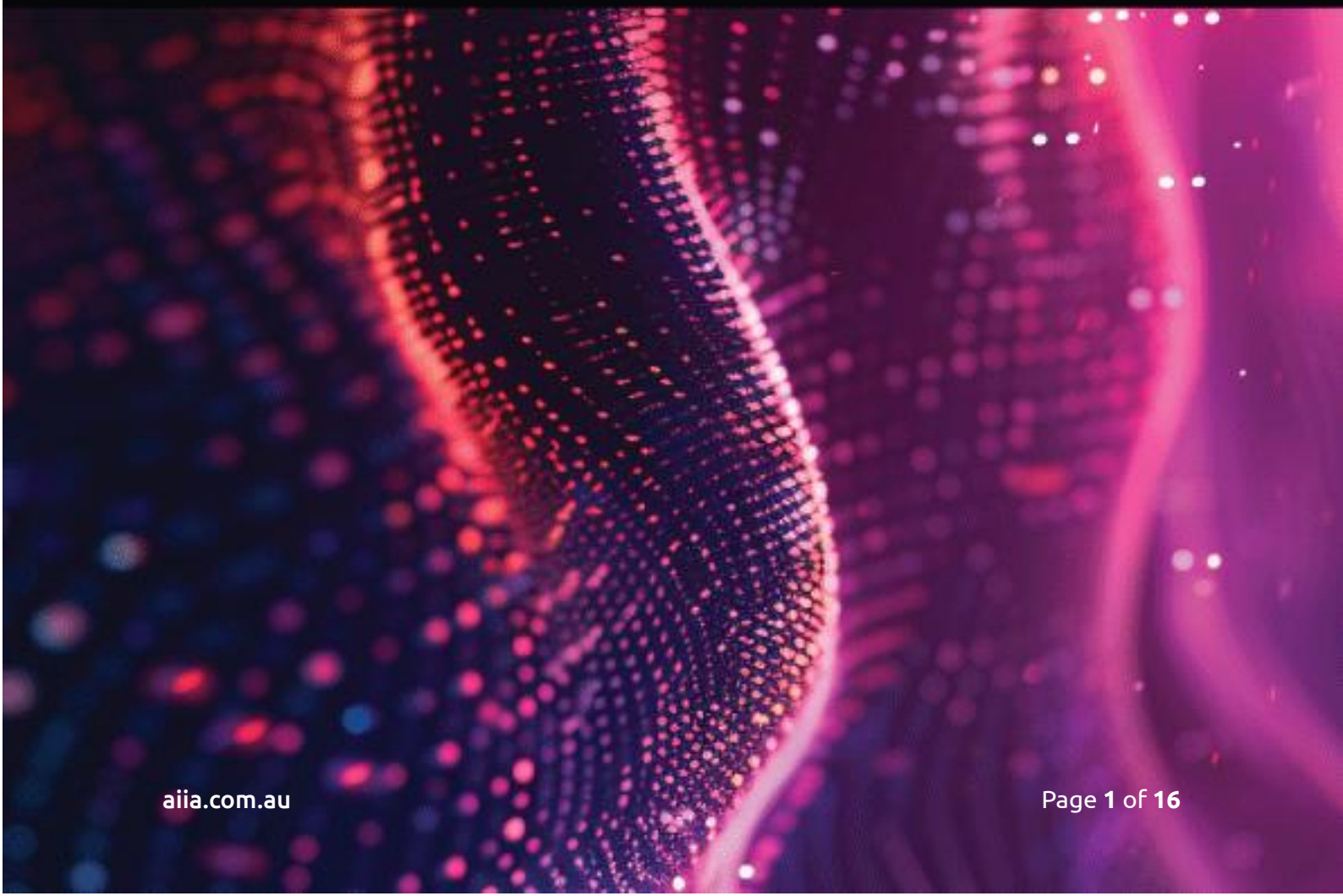
Australian Information
Industry Association

Australian Information Industry Association

An Artificial Intelligence (AI) strategy for the South Australian government



About the AIIA

The Australian Information Industry Association (AIIA) is the nation's peak body for those in the digital ecosystem, leading strategic policy and advocacy to shape a thriving digital sector. Through strong engagement with government, industry, and the broader community, the AIIA ensures the voice of its members informs decision-making on technology, innovation, and digital capability.

Membership provides direct access to influential networks, premium events, and opportunities to collaborate on initiatives with the sector's best and brightest to drive industry growth, improve productivity, and secure Australia's place as a global technology leader. AIIA members access real collaboration, real connections, and real outcomes.

Introduction

The Australian Information Industry Association (AIIA) welcomes the release of the South Australian Government's Discussion Paper on an Artificial Intelligence (AI) Strategy for the Public Sector. This document provides a clear and pragmatic foundation for AI adoption, focussed on topics including service quality, efficiency, decision support, and community trust. As the peak body representing Australia's information and communications technology (ICT) industry, the AIIA brings together local and national perspectives from over 400 member organisations, including innovative startups, SMEs, and global enterprises.

The AIIA has actively engaged with the ICT industry on AI topics, gathering feedback through consultations, policy advisory networks, and member submissions to deliver a comprehensive industry position. Our history of collaboration with the Government of South Australia (including contributions to digital economy initiatives, cybersecurity frameworks, and innovation showcases) positions us as a committed partner in shaping this strategy. We appreciate the opportunity to provide this response and reinforce our willingness to engage further. Our local Council and national members are keen to support the state's ambition to become a leader in responsible AI while driving economic growth, job creation, and improved public services.

This submission responds to the Discussion Paper's scope, focusing on the government's internal adoption of AI (vision, tasks and service delivery, workforce capability, technology, and policy). However, we emphasise the need for broader engagement on AI's state-wide implications, including how government leadership can influence industry responses and foster ecosystem-wide support. To this end, the AIIA recommends an ongoing industry engagement program to align the AI Strategy with private sector capabilities, ensuring mutual benefits and sustainable implementation.

Summary of Recommendations

Drawing on extensive consultation with members and industry stakeholders, AIIA has identified thirteen priority recommendations to support South Australia's ambition to become a leader in responsible AI. Together, these recommendations provide a practical roadmap for government, spanning strategy, workforce, infrastructure, procurement and governance, while also addressing the broader economic and ecosystem impacts of AI adoption. Collectively, they reflect a whole-of-state approach that positions AI not merely as a tool for internal efficiency, but as foundational productivity infrastructure for the State's future economy.

Recommendation One: Adopt a living, whole-of-economy AI strategy

Recommendation Two: Establish structured industry and cross-jurisdictional engagement

Recommendation Three: Embed an industry growth and sovereign capability agenda

Recommendation Four: Build a whole-of-state AI skills pipeline

Recommendation Five: Prepare the workforce for AI

Recommendation Six: Deliver inclusive, job-ready capability development

Recommendation Seven: Establish an end-to-end AI delivery model

Recommendation Eight: Build shared infrastructure and data foundations

Recommendation Nine: Reform procurement and funding to enable scale

Recommendation Ten: Enable value capture and inclusive impact

Recommendation Eleven: Establish a trusted AI governance framework

Recommendation Twelve: Embed ethics, inclusion and human rights by design

Recommendation Thirteen: Strengthen risk management, security and sustainability

Topic 1: Scope of the Discussion Paper and Future Engagement

The Discussion Paper appropriately prioritises the Government of South Australia's own AI adoption, articulating a clear vision for improved public services across workforce capability, service delivery, technology and policy settings. This internal focus is an important foundation. However, given AI's economy-wide impact, the Strategy should also adopt a broader lens by addressing economic development, industry innovation and cross-sector collaboration to ensure South Australia captures the full productivity, investment and capability benefits of AI.

The Government of South Australia plays a pivotal role in shaping industry adoption of AI through its procurement settings, regulatory frameworks and strategic partnerships. These levers can either catalyse uptake or inadvertently create barriers. Clear government demand signals can stimulate private investment and capability development in priority sectors such as defence, green industries, health and ag-tech areas where South Australia has existing strengths. Without deliberate industry engagement and alignment, however, the Strategy risks implementation challenges, including workforce shortages, fragmented infrastructure and uneven delivery outcomes.

An Adaptive, Living Strategy

AIIA strongly recommends that the AI Strategy be designed as a living framework, not a static policy document. The pace of AI change is rapid, with capabilities evolving in months rather than years and new models of deployment emerging continuously. A "set and forget" approach risks falling behind the technology curve and locking South Australia into outdated settings. Instead, the Strategy should embed regular review cycles, industry input and adaptive governance to ensure it remains aligned with real-world capability, risk and opportunity.

To remain current and effective, the Strategy should include formal review cycles, at least annually, with scope for interim updates in response to major technological or policy shifts. This should be supported by a standing advisory mechanism comprising industry, academia and community representatives to provide timely intelligence on emerging risks and opportunities.

The Government should also assess whether existing organisational structures, including the resourcing and mandate of the Office for AI, are sufficiently agile to support ongoing adaptation and delivery.

Cross-Border Collaboration and Technology Partnerships

While the Discussion Paper focuses on South Australia's public sector, AI strategy development is occurring across all Australian jurisdictions. This presents an opportunity for South Australia to lead in formal cross-jurisdictional collaboration, including sharing pilot learnings, co-developing common standards where appropriate and reducing

duplication. Engagement with national bodies such as the National AI Centre and the AI Safety Institute, alongside equivalent state offices, would strengthen South Australia's approach and contribute to a more coherent national AI framework.

The Strategy should also consider structured technology partnerships with leading model providers. In the private sector, such partnerships provide early access to emerging capabilities, support for sovereign deployments and input into product roadmaps. Governments have been slower to adopt this approach. South Australia has an opportunity to move early, securing partnerships that provide privileged access to advanced platforms while ensuring public sector requirements are reflected in global development pathways.

AIIA's Call to Action

The AIIA recommends establishing a structured industry engagement program, including regular forums, co-design workshops, and joint pilots. This program should support the development of South Australia's Al Strategy by incorporating industry insights on emerging technologies, risk management, and scalability. Such collaboration will ensure the strategy is not only government-centric but also catalyses state-wide Al growth, aligning with national frameworks.[1]

The AI Strategy should incorporate a clear industry growth agenda, targeting priority sectors such as defence, health, energy and ag tech where South Australia holds comparative advantage. This should be complemented by measures to strengthen sovereign capability, including support for applied research through the Australian Institute for Machine Learning (AIML), targeted incentives to encourage commercialisation and scale-up, streamlined talent pathways, expanded access to high-quality public data, and innovation programs that accelerate industry deployment.

By embedding industry intelligence into long-term planning, the Strategy can be informed by practical market insights, such as those outlined in Australia's AI Opportunities Report[2], highlighting service delivery, economic growth and workforce development opportunities. This approach would strengthen policy design and help ensure the South Australian Government's AI Strategy is grounded in real-world capability, demand and investment signals.

This will create jobs, attract investment, and ensure long-term economic and social prosperity.

Recommendation One: Adopt a living, whole-of-economy AI strategy
Design the Strategy as a living framework with annual review and adaptive governance, expanding its scope beyond public sector adoption to explicitly support economic development, industry innovation and cross-sector collaboration.

[1] Australian Government, Policy for the responsible use of AI in government (v2.0).
[2] Australia's AI Opportunities, <https://aiia.com.au/wp-content/uploads/2025/10/Australias-AI-Opportunity-Report.pdf>.

Recommendation Two: Establish structured industry and cross-jurisdictional engagement
Implement a formal engagement program including industry forums, co-design and joint pilots, alongside cross-border collaboration with other jurisdictions and national bodies, to align government demand with market capability and reduce duplication.

Recommendation Three: Embed an industry growth and sovereign capability agenda
Target priority sectors such as defence, health, energy and ag tech, supported by applied research through AIML, commercialisation incentives, talent pathways, access to high-quality public data and strategic technology partnerships to drive investment, jobs and sovereign AI capability.

Topic 2: Workforce and Skills

Workforce capability is essential to effective AI adoption, requiring baseline AI literacy across the public sector to reduce risks such as unauthorised tool use, while enabling frontline co-design and service innovation. Given workforce mobility between the public and private sectors, a whole-of-state approach is needed to build skills, support transitions, strengthen industry collaboration, address critical shortages (including data science and cybersecurity), and attract and retain specialised talent.

Community engagement is equally important. Framing AI solely as an efficiency measure, risks overlooking its capacity to enable new services, improve policy targeting and deliver better community outcomes. The Strategy should therefore embed inclusion by design, ensuring equitable access, capability development and participation for Aboriginal communities, culturally and linguistically diverse (CALD) communities, and people with disability.

Drawing on member insights, AIIA recommends positioning workforce capability as a core pillar of the Strategy, supported by role-based, modular learning pathways, including micro-credentials and practical change management support. As AI reshapes job roles, automating routine tasks while increasing demand for digital literacy, problem-solving, collaboration and risk awareness, the Strategy should emphasise governance capability, bias detection and sustained human oversight alongside technical skills.

Human-Agent Collaboration as a Workforce Paradigm

The AIIA recommends that the Strategy explicitly recognise the shift toward human-agent collaboration as a defining feature of the future workforce. AI agents, systems that can autonomously perform multi-step tasks, reason about goals, and interact with other systems, are rapidly moving from research into production environments. In the public sector, this means that workers will increasingly operate alongside AI agents that handle routine case processing, draft correspondence, conduct preliminary research, or manage scheduling and logistics.

This is not simply automation of discrete tasks but a fundamental rethinking of how work is structured. Workforce planning, role design, and training programs must account for a model where human workers supervise, direct, and collaborate with AI agents rather than performing all steps manually. The skills required for effective human-agent teaming, including the ability to set clear objectives for agents, critically evaluate agent outputs, manage exceptions, and maintain accountability, should be embedded across all capability tiers.

Physical AI and Its Workforce Implications

The AIIA also draws the Government's attention to the rapid emergence of physical AI, the integration of AI with robotics, autonomous systems, and the physical environment. While the Discussion Paper focuses largely on digital and software-based AI applications, the convergence of AI with physical systems will have significant implications for South Australia's workforce, particularly in industries such as mining, construction, housing, agriculture, manufacturing, and logistics.

Physical AI is poised to transform trades and manual occupations in ways that require proactive workforce planning. Autonomous machinery, AI-directed construction robots, precision agriculture systems, and AI-enabled mining equipment are already being deployed globally. South Australia, with its strengths in mining, defence, and agriculture, will be directly affected. The AI Strategy should consider how the public sector's own workforce planning and its broader industry development agenda can prepare for these shifts, including through vocational training partnerships, TAFE-industry collaboration on AI-augmented trades, and regulatory frameworks that support safe deployment of physical AI systems.

Capability Model: A Tiered Structure to Build Confidence and Safety

Tier	Description	Target Audience	Key Skills
Foundational	Basic AI literacy for safe, ethical, and secure use, including when human oversight is needed.	All staff	Digital literacy, ethical guidelines, tool limitations, human-agent awareness.
Practitioner	For owning AI-enabled processes, focusing on validation, human-agent teaming, and communication of outputs.	Business/policy roles (e.g., frontline staff, managers)	Problem-solving, data literacy, prompt engineering, agent supervision, collaboration.

Specialist	Advanced skills for deployment, assurance, and physical AI integration.	Technical roles (e.g., data scientists, governance officers, robotics engineers)	Risk assessment, bias detection, model governance, cybersecurity, physical AI safety.

Recommendations for Workforce and Skills:

- Address critical shortages through targeted recruitment, industry partnerships and applied project placements.
- Shift training into workplace capability through structured programs, safe learning environments and clear uplift metrics such as completion rates and defined human oversight roles.
- Embed equitable access across skills pathways to support a fair AI transition and prevent capability gaps.
- Invest in human–agent collaboration training across all levels, preparing workers for operating alongside AI systems, not just using them as tools.
- Develop physical AI workforce readiness programs with TAFEs, universities and industry to support the transition of trades and manual roles.

This model aligns with global best practices[3] and will help South Australia attract and retain talent while fostering a culture of responsible innovation.

Recommendation Four: Build a whole-of-state AI skills pipeline
Position workforce capability as a core pillar of the Strategy, delivering baseline AI literacy across the public sector and coordinated skills pathways spanning government, industry and education to address shortages in data, cybersecurity and advanced digital roles.

Recommendation Five: Prepare the workforce for AI
Embed training for human-agent collaboration across all roles and establish physical AI readiness programs with TAFEs, universities and industry to support trades and manual occupations affected by robotics and autonomous systems.

Recommendation Six: Deliver inclusive, job-ready capability development
Implement role-based learning pathways (foundational, practitioner and specialist) supported by micro-credentials, applied project placements and safe learning environments, ensuring equitable access for Aboriginal communities, CALD communities and people with disability while embedding governance, bias awareness and human oversight skills.

[3] Such as the OECD Framework for the Classification of AI systems (EN).

Topic 3: Delivery and Productive Use

While the Discussion Paper identifies priority use cases, effective AI scale-up requires clear delivery and governance settings aligned with procurement, innovation frameworks, guardrails and industry engagement. The Strategy should establish an end-to-end AI delivery model spanning pilots, procurement, program management, platform deployment and business-as-usual support, integrated with existing ICT governance frameworks.

Infrastructure is also central to the AI Strategy. It should consider public-private investment in AI tools and services to drive economic outcomes. To guide technology choices such as privacy controls, local capability and open source versus proprietary solutions, the Strategy should set clear objectives, enabling industry to provide targeted, practical advice.

Priority Impact Areas

Based on industry experience, the South Australian Government should prioritise domains with strong data availability, cross-agency impact and rapid, demonstrable value. The following areas are suggested for their alignment with current public sector priorities:

1. **Health System Efficiency:** Workforce productivity, discharge optimisation, demand forecasting.
2. **Emergency Services:** Real-time awareness, automated triage, predictive modelling.
3. **Education:** Personalised learning, assessment automation, early intervention.
4. **Transport:** Digital twins, network optimisation, incident response.
5. **Citizen Services:** Intelligent agents, case automation, multilingual access.

Equity in Delivery

The South Australian Government should ensure AI improves access for regional communities, people with disability and CALD groups through early co-design and inclusive impact assessment of the Strategy. This is addressed further under Topic 4.

Enablers for Scale

The AIIA recommends a comprehensive set of enablers to support AI scale across the South Australian public sector. These measures address key adoption barriers and draw on established frameworks, including the Australian Government's Policy for the Responsible Use of AI in Government 2025 and the OECD AI Principles 2019.

Implementing these enablers would support a shift from isolated pilots to sustained, enterprise-wide deployment, enabling innovation while managing risk. The following sections outline each enabler, the issue identified, the proposed response and the supporting rationale, informed by industry practice and policy precedent.

Platforms: Building Shared Infrastructure for Efficient and Secure AI Deployment

Scaling AI requires reliable, interoperable infrastructure to support development, testing and operations. Siloed agency approaches drive duplication, higher costs and uneven security, while limited access to advanced tools constrains innovation, particularly for smaller agencies and partners.

The AIIA recommends developing a statewide shared AI platform that includes:

- Tools to enhance accuracy in information retrieval tasks.
- Capabilities for automated model lifecycle management, including training, deployment, and monitoring.
- Secure data access mechanisms, such as federated learning protocols, to enable collaboration without compromising privacy.
- Support for hybrid cloud architectures, allowing flexible use of sovereign, public, and private clouds based on risk levels.

The platform should operate under central governance, with clear accreditation pathways aligned to data residency and sovereignty requirements, consistent with existing cloud assurance models.

Procurement: Reforming Processes to Support Innovation and Local Growth

Traditional procurement models are often lengthy and biased toward large vendors, limiting access for SMEs and startups. This stifles innovation, particularly in AI, where rapid iteration and pilot testing are essential, and interoperability issues can impede scaling.

The AIIA recommends procurement reforms including:

- Fast-path tenders for AI projects to shorten approval timelines for time-critical initiatives.
- SME-inclusive processes, including simplified documentation and alignment with existing SME procurement policies.
- Dedicated pilot pathways that support low-risk testing with clear transition to full deployment.
- Principles-based governance for interoperability and data portability, supported by vendor assurance, to enable integration across global technologies without constraining innovation.
- Exploration of flexible commercial models beyond traditional licensing, including subscription, consumption-based pricing, AI-as-a-Service and shared-risk arrangements, to reduce upfront costs and reflect iterative delivery.

- Outcome-based contracting that focuses on delivered value rather than prescriptive specifications, enabling vendors to innovate in how they meet government needs.

Monetisation and Value Capture

AIIA encourages the South Australian Government to take an ambitious approach to value capture from AI investment. Beyond efficiency gains, the Strategy should consider how AI capability, data assets and delivery learnings can generate wider economic returns. This may include licensing internally developed tools to other jurisdictions, enabling data marketplaces for non-sensitive public datasets, or establishing centres of excellence that attract national and international investment. The Strategy should also clarify intellectual property settings for co-developed AI, ensuring the State retains appropriate rights in publicly funded systems while maintaining strong incentives for private sector participation.

This should include development of fair IP and licensing frameworks for AI training data, providing legal certainty for innovators while ensuring creators are appropriately recognised and remunerated.

Funding: Implementing Sustainable Models for Long-Term Impact

AI initiatives often stall under short-term funding cycles, with limited pathways to assess and scale successful pilots. This leads to wasted effort and lost economic value. AIIA recommends multi-year funding models structured around a Pilot to Scale to Business-as-Usual pathway, with clear assessment gates and transparent metrics such as cost savings, service outcomes and risk reduction, enabling agencies to embed proven solutions.

Data Foundations: A Cross-Government Data Strategy

AIIA notes that the Discussion Paper would benefit from stronger emphasis on data as a foundational enabler of AI. Systems are only as effective as the data that supports them, and many public sector AI initiatives stall due to poor data quality, fragmented holdings, inconsistent metadata and unclear governance, rather than technology limits. AIIA recommends the Strategy be supported by, or explicitly linked to, a cross-government data strategy addressing data quality standards, cataloguing and discoverability, consent and privacy frameworks for data sharing, and investment in data engineering capability alongside AI skills.

Recommendation Seven: Establish an end-to-end AI delivery model
Implement a whole-of-government delivery framework spanning pilots, procurement, platforms and business-as-usual operations, integrated with existing ICT governance, to support consistent scale-up from experimentation to enterprise deployment.

Recommendation Eight: Build shared infrastructure and data foundations
Develop a centrally governed statewide AI platform with lifecycle management tools, secure data access and hybrid cloud capability, supported by a cross-government data strategy addressing data quality, discoverability, privacy frameworks and data engineering capability.

Recommendation Nine: Reform procurement and funding to enable scale
Introduce fast-path pilots, SME-inclusive procurement, outcome-based contracting and flexible commercial models, alongside multi-year Pilot → Scale → Business-as-Usual funding pathways with clear assessment gates and metrics.

Recommendation Ten: Enable value capture and inclusive impact
Prioritise high-impact service domains, embed inclusive design from the outset, and pursue value capture through IP clarity, data-enabled services and centres of excellence that attract investment and support local industry growth.

Topic 4: Ethics and Safety

The AI Strategy must prioritise ethics and safety to maintain public trust, protect human rights and support equitable outcomes. This includes extending existing inclusion programs for underrepresented groups, including Aboriginal and Torres Strait Islander peoples, women and girls, culturally and linguistically diverse communities, people with disability and SMEs. The Strategy should embed inclusion and accessibility from the outset, supported by AI-specific guidance aligned to existing ICT governance frameworks.

These settings should require human-in-the-loop oversight for high-impact decisions, clear pathways to contest AI outputs, and alignment with national and international responsible AI principles, ensuring adoption is trusted, transparent and accountable.

Governance: Establishing Robust Frameworks for Trust and Accountability

The rapid pace of AI development requires clear governance to manage risk, ensure ethical use and maintain public trust. Without structured oversight, deployments may introduce inconsistency, bias or security vulnerabilities, particularly in high-impact areas such as health and public safety. Current approaches often lack operational clarity on risk classification and transparency, which can limit safe, scalable adoption.

AIIA recommends the South Australian Government establish:

- An AI risk framework classifying systems by decision impact, data sensitivity and potential harm.

- Mandatory documentation covering system purpose, training data, limitations and performance.
- Pre-deployment testing protocols for high-risk systems to identify vulnerabilities.
- A central AI Transparency Register, publicly accessible where appropriate, listing government AI systems, owners, risk ratings and monitoring outcomes.

Together, these measures would position South Australia as a trusted jurisdiction for AI deployment, supporting investment while strengthening sovereign capability.

Risk Management: Addressing Opacity, Privacy, and Security

AI introduces risks including algorithmic bias, data breaches and unintended harm, particularly in high-impact domains where weak safeguards can worsen inequality or undermine security.

AIIA recommends:

- A tiered risk framework classifying systems by impact, with mandatory adversarial testing for high-risk applications.
- Preference for explainable models in sensitive contexts, supported by privacy-by-design measures such as data minimisation and encryption.
- Clear controls on unauthorised AI use, supported by workforce training to identify and manage risk.

Alignment with existing cybersecurity standards, including the Australian Signals Directorate Essential Eight, is essential.

Inclusive Safeguards: Promoting Equity and Accessibility

AI can reinforce existing disadvantage if not designed inclusively, disproportionately impacting vulnerable communities and widening digital divides.

AIIA recommends:

- Use representative datasets with mandatory bias audits to ensure fair outcomes across demographics.
- Co-design with affected communities, including Aboriginal and Torres Strait Islander peoples and CALD communities, from pilot stages.
- Apply inclusive design standards covering accessibility, multilingual support and cultural safety, with clear recourse such as human review of decisions.

Existing programs, including women in STEM and Indigenous digital inclusion initiatives,

Human Oversight and Contestability: Ensuring Accountability

Over-reliance on AI without human oversight can lead to unchallengeable errors and weaken accountability in public sector decision-making.

AIIA recommends:

- Mandatory human-in-the-loop controls for high-impact decisions, with clear escalation and redress pathways.
- Risk-based explainability requirements so users can understand and contest outputs.
- Designated accountable officers for each AI use case, supported by training in ethical governance.

These measures should be embedded in operational policy, with defined metrics to monitor compliance.

Measurement: Tracking Ethical Outcomes and Success

Without clear metrics, the ethical impact of AI is difficult to measure, limiting continuous improvement and public accountability.

AIIA recommends a KPI framework covering:

- Ethical compliance, including bias audit results and human oversight rates.
- Societal outcomes, such as equity gains and public trust indicators.
- Economic impact, including AI jobs created and solutions scaled.

Progress against these metrics should be assessed through regular independent reviews.

Sustainability and Environmental Impacts

AIIA recommends that the AI Strategy address the environmental and social impacts of AI adoption. Training and operating large models require substantial compute capacity, with associated energy and water demands. As a jurisdiction with strong renewable energy capability and a record of social leadership, South Australia is well placed to lead in sustainable AI deployment.

The Strategy should encourage assessment of the environmental footprint of AI systems, preference for energy-efficient architectures where appropriate, and consideration of how renewable energy capacity can support AI infrastructure investment. Sustainability settings should be aligned with existing South Australian energy, climate and social policy frameworks to ensure consistency and long-term impact.

In addition to workforce capability, AIIA recommends a public AI engagement and literacy program to build community confidence and social licence. This should include clear communication of how AI is used in government services, practical digital literacy resources, and citizen forums to surface ethical concerns and inform policy design.

Strategy-Level Accountability: An Annual Public Scorecard

Beyond tracking individual systems, AIIA recommends the Government also measure whether the Strategy itself is delivering against its objectives. While the Discussion Paper sets an ambitious vision, without transparent reporting there is a risk the Strategy does not translate into sustained action.

AIIA recommends publishing an annual AI Strategy Scorecard reporting progress across key pillars, including indicators such as pilots launched and scaled to production, workforce capability uplift, procurement reform milestones, shared platform adoption, industry partnerships and community trust. The Scorecard should be publicly available and supported by independent review, creating transparency and enabling the annual refresh proposed elsewhere in this submission.

This approach reinforces AIIA's recommendation that the Strategy operate as a living framework. An annual Scorecard provides accountability and a clear evidence base for iterative improvement, ensuring the Strategy remains aligned with evolving technology, risk and opportunity.

AIIA further recommends requiring Responsible AI Commitments for all state-funded AI initiatives, supported by annual public transparency reporting on system purpose, risk mitigation and audit outcomes.

South Australia has positioned itself as a national leader by appointing Australia's first dedicated Assistant Minister for Artificial Intelligence. That leadership now creates an opportunity to embed strong governance at the centre of the State's AI agenda. The AIIA believes that trusted adoption depends on clear accountability, transparent oversight and defined responsibility. The Assistant Minister should therefore have explicit oversight of AI governance settings and ultimate responsibility for ensuring AI systems are deployed safely, ethically and in a manner that strengthens public trust across the State.

Recommendation Eleven: Establish a trusted AI governance framework
Implement a formal governance model including risk classification by impact and data sensitivity, mandatory system documentation, pre-deployment testing for high-risk applications, a central AI Transparency Register, and designated accountable officers, supported by human-in-the-loop controls and contestability pathways.

Recommendation Twelve: Embed ethics, inclusion and human rights by design
Integrate inclusive safeguards from inception through representative datasets, bias audits, community co-design, accessibility standards and cultural safety, extending existing programs for Aboriginal and Torres Strait Islander peoples, CALD communities, people with disability, women and SMEs.

Recommendation Thirteen: Strengthen risk management, security and sustainability
Adopt tiered risk controls with adversarial testing, explainable models in sensitive contexts, privacy-by-design measures and workforce training to prevent unauthorised AI use, aligned with ASD Essential Eight. Incorporate sustainability by assessing environmental impacts, prioritising energy-efficient architectures and leveraging South Australia's renewable capacity.

Recommendation Fourteen: Introduce strategy-level accountability and measurement
Establish a KPI framework covering ethical compliance, societal outcomes and economic impact, supported by independent review and a public annual AI Strategy Scorecard to track progress and enable continuous improvement.

Conclusion

AIIA commends the South Australian Government's leadership in establishing the nation's first Office for AI and stands ready to partner in delivering a responsible and ambitious AI Strategy. By prioritising delivery, workforce capability, ethics, industry partnerships and adaptive governance, South Australia can position itself as Australia's hub for safe, sovereign AI.

The Strategy must operate as a living framework, with regular review and public accountability through an annual scorecard tracking progress against stated objectives. AIIA urges the Government to invest in cross-jurisdictional collaboration, technology partnerships and organisational agility to ensure the Strategy remains a dynamic driver of transformation, economic growth and improved public services for all South Australians.