

Submission

To	Office for AI
Topic	An Artificial Intelligence strategy for the South Australian government
Date	20/02/2026

Contact

E advocacy@unitingcommunities.org

P 08 8202 5111

About

We are an inclusive not-for-profit organisation working alongside more than 80,000 South Australians each year and have been creating positive change for South Australian communities for more than 120 years. We advocate for systems change across diverse social justice issues to shape public and social policy that delivers better outcomes for marginalised communities.

We offer more than 90 services across the state, supporting people in areas including aged care, disability, homelessness, child protection, alcohol and other drugs, legal assistance and family and domestic violence.

We support those in need to find the courage to move forward through enriching their lives and uniting the communities in which they live. By tackling the deep-seated challenges that affect people's lives, we are working to create systemic change and brighter futures for all South Australians.

Uniting Communities has previously partnered with Flinders University on the [*Data for Good*](#) project, which examined how data and emerging technologies can be used ethically to improve outcomes for vulnerable communities. The insights from this work continue to inform our approach to responsible data practices and our advocacy for safe, transparent, and community-centred uses of AI across government.

Submission on AI Strategy for the South Australian Government

Uniting Communities thanks the Office for AI for the opportunity to contribute to their consultation on a new Artificial Intelligence Strategy for the South Australian Government.

The Strategy must be grounded in the principle that efficiency should never come at the expense of quality or safety. While the use of AI across government is inevitable, and can be positive, there is a real risk that core processes could lose essential human involvement if implementation is not carefully managed. Strong regulation, oversight, and governance will be critical to ensuring that AI delivers positive outcomes for the community and enhances, rather than diminishes, the quality of public services.

Our key recommendations:

1. Establish a whole-of-government regulatory and transparency framework, including mandatory monitoring, evaluation, and clear public communication about when and how AI is used.
2. Ensure AI always supports, and never replaces, human judgement, with strong safeguards against bias and protections for people who face barriers to access.
3. Embed Aboriginal and Torres Strait Islander data sovereignty and community-led governance throughout AI design, implementation, and oversight.
4. Clearly define where AI is appropriate and where it must not be used, particularly in relational, ethical, or client-facing work where human insight is essential.
5. Create an independent statutory authority to oversee government use of AI, supported by an accessible complaints and appeals pathway for the community.

Additional Comments

What does trust look like for government in its use of AI in work and services?

Trust in government use of AI requires a high level of transparency. The public must be clearly informed about when and how AI is being used, particularly in contexts involving large-scale assessments or data-driven decision-making. Transparency should be embedded as a rigorous, whole-of-government requirement rather than an optional practice.

Trust also depends on strong monitoring and evaluation processes. The State Government must be able to demonstrate how AI systems are being used, whether they are adding value, and whether any unintended or negative impacts are emerging.

Given that many departments are developing or trialling AI independently, a consistent, whole-of-government regulatory framework is essential. Clear criteria and governance structures will help ensure that AI is used safely, ethically, and consistently across the public sector.

Building trust also requires acknowledging the vulnerability inherent in rapidly evolving technologies, where safe use and governance frameworks are still maturing. This includes recognising the risks of deploying tools that lack a strong evidence base, particularly in a context where many people already feel their data is used without their discretion. People must have genuine choice. If individuals choose not to engage with AI, they should not receive a lower level of service or reduced access to support.

Finally, a clear and accessible complaints/appeals process is critical to building trust. People need a pathway to challenge decisions where AI has been used, raise concerns about inappropriate or ineffective use, and request a review or investigation if they believe an AI-informed outcome is incorrect.

Are there specific risks or challenges you think the government should focus on in these areas when adopting AI?

A key risk the Strategy must address is the inherent bias within AI systems, particularly when they are used to inform assessments or analyse data. Human decision-makers also carry bias, which is precisely why AI must never replace a person's judgement; both require checks and balances, and accountability must remain with people. Instead, AI should be used to support existing processes, with people remaining responsible for the final decision.

AI often contributes to an outcome but does not reach the outcome on its own. Public servants frequently need to interpret, challenge, or 'workshop' AI-generated outputs. Any frameworks or guidance provided to government staff must acknowledge this reality and reinforce that human oversight is non-negotiable.

The Strategy should also caution against relying on AI to inform decisions that may have adverse impacts without appropriate checks and balances. While AI can help government analyse data and provide evidence for policy development, this must occur within a robust governance framework that ensures accuracy, fairness, and accountability.

The development of a new AI Strategy must explicitly safeguard the rights of people from marginalised communities. This requires robust risk-management protocols, particularly for groups who already face barriers to access and participation. There are significant risks of exclusion for people with low digital literacy, limited access to technology, or specific support needs — including some older people and people with disability, such as those with complex communication needs. Without appropriate safeguards, these cohorts may disengage or fall through the gaps in service systems. It is therefore essential that alternative, non-AI pathways remain available, including the option to opt out of AI-enabled processes when seeking information or support.

What considerations arise for government in its use of AI in services for Aboriginal South Australians, culturally and linguistically diverse communities, and people with disability?

For Aboriginal South Australians, culturally and linguistically diverse communities, and people with disability, any progression toward the use of AI in South Australia must be grounded in the learnings from previous data-collection practices, particularly the impacts these have had on Aboriginal and Torres Strait Islander peoples. Data sovereignty remains a significant tension point, and the Strategy should explicitly acknowledge the need to rebuild trust by ensuring that AI systems are designed and governed in ways that respect community ownership, context, and cultural authority.

AI must be more human-centred than many current algorithmic approaches. This includes recognising contextual factors, understanding that data rarely tells the full story, and being programmed to consider broader risks and lived-experience insights. Past examples of algorithmic harm demonstrate the consequences of failing to do so. South Australia has an opportunity to ensure AI is used for good by embedding safeguards, cultural governance, and community-led design from the outset.

What do you think the public sector workforce needs in order to confidently use AI in their jobs (e.g. training, guidelines, cultural change)?

Robust guidelines will be critical as will be the education, not only for public servants but those engaging with such services including how to use it effectively.

In your view, what safeguards are most important to ensure AI is used ethically and safely in government?

An ethical and safe approach to AI requires clarity about where AI adds value, and where it should not be used. The Strategy must identify the tasks and processes that genuinely benefit from AI, while also being explicit about areas where AI is inappropriate or risks undermining quality, safety, or human judgement. This clarity should be supported by ongoing consultation, recognising that implementation will involve trial, learning, and refinement rather than a rapid transition.

As highlighted in the discussion paper, ‘always keeping a “human in the loop” for important decisions,’ is essential. In some functions, critical human thinking must never be removed from the process. For example, case notes in social work rely on the practitioner’s direct interaction with the client, their professional judgement, and the nuances of the relationship. Some of these elements cannot be replicated by an AI tool, and safeguards are needed to ensure that AI does not displace essential human insight.

The Strategy should therefore ensure that AI is used to support, not replace, professional practice, and that people remain responsible for final decisions in contexts where judgement, ethics, and relational understanding are central.

How should the government involve the community, industry, and experts in governing AI and keeping its use accountable?

As noted above, a clear and accessible complaints pathway is a critical safeguard, enabling people to raise concerns and seek review where AI has been used inappropriately or ineffectively. To provide genuine oversight, a dedicated governing body is needed, ideally an independent statutory authority that supports the public sector’s integration and use of AI. Such a body should not only set consistent standards and guide safe implementation, but also serve as the independent mechanism for handling disputes and complaints, ensuring that community voices, industry expertise, and specialist knowledge are embedded in ongoing governance.

Conclusion

We appreciate the opportunity to provide a submission to the Office for AI on a new AI strategy for the South Australian government. The safe and ethical use of AI will depend on clear safeguards, transparent governance, and a commitment to ensuring that technology enhances, rather than replaces, human judgement and community trust. With the right foundations, South Australia can lead the way in using AI to strengthen public services and deliver fair, accountable, and inclusive outcomes for all South Australians.