



## **ACCENTURE SUBMISSION**

### **Productivity Commission's Interim Reports Consultation**

## Executive Summary

Accenture welcomes the Productivity Commission's (the Commission) Interim Reports as a bold and necessary step toward revitalising Australia's productivity and economic growth through structural reform, digital enablement and skills development. The Commission's proposals spanning corporate tax reform, data access, AI regulation, digital capability and workforce adaptability form a comprehensive blueprint for positioning Australia as a leading, future-ready economy.

Drawing on our global experience across more than 120 countries and deep partnerships with governments, industries and communities, Accenture provides this submission to support the translation of the Commission's recommendations into scalable, practical outcomes. Our insights are informed by over 2,000 generative AI engagements globally, public-private partnerships in Europe, North America and Asia, and direct involvement in Australia's national digital skills and transformation initiatives.

If you have any questions about the content of our submission, please contact Robbie Rynehart, Government Affairs Lead Accenture Australia and New Zealand at [REDACTED]

### Key Themes

#### *Technology-led productivity*

Emerging technologies, particularly generative AI, automation, cloud and data platforms offer transformative productivity potential across the economy. Accenture modelling shows that generative AI alone could impact up to 45 per cent of work hours, potentially boosting productivity by ten percentage points.

The Commission's recommendation to lower the corporate tax rate for companies under \$1 billion turnover and implement a net cashflow tax regime aligns with international best practice in incentivising capital investment in AI, Research & Development (R&D) and digital infrastructure. These changes will accelerate adoption and scale-up of AI technologies, especially among small and mid-sized companies.

#### *Modernising regulation and data governance*

A technology-neutral, outcomes-based approach to AI regulation, supported by sector-specific data access pathways and privacy reform, will create an enabling environment for responsible innovation. Accenture has supported similar regulatory transitions in Singapore, the UK and Canada where agile frameworks, regulatory sandboxes and real-time compliance tools have driven safe and accelerated technology deployment.

Mandatory digital financial reporting, streamlined occupational credentialing and unified digital infrastructure can further reduce compliance costs, increase trust and unlock productivity in both public and private sectors.

#### *Workforce enablement and digital capability*

Productivity is fundamentally human led. Accenture's global research confirms that organisations that invest in technology and workforce transformation are 2.8 times more likely to achieve enterprise-wide impact.

The Commission's focus on foundational skills, lifelong learning and flexible career pathways is critical. We support national expansion of digital upskilling initiatives, the creation of a national skills and credentialing database, and wider adoption of competency-based licensing.

Accenture's work globally and within Australia, such as our partnership with the NSW government on the Digital Skills Compact and our investment in the Ballarat Technology and Operations Centre, demonstrates how scalable, people-centric digital strategies can deliver high-value employment, inclusion and regional economic development.

#### *Transforming Australia's care economy*

The Commission's Fifth Interim Report highlights the transformative potential of AI and digital solutions in healthcare, aged care, disability support and early childhood education. Regulatory harmonisation, shared data platforms and outcome-based funding models will be essential to enabling integrated, responsive and efficient care delivery.

Globally, Accenture has supported governments in automating quality assurance, enabling collaborative commissioning and applying predictive analytics for early intervention resulting in improved care outcomes, workforce optimisation and system-wide cost reductions.

#### *Driving collaborative innovation and sovereign capability*

A national innovation strategy anchored in public-private partnerships, regional tech hubs and mission-led R&D will be crucial to closing the digital maturity gap, especially between large and mid-sized businesses. Initiatives like Gaia-X in Europe, Manufacturing USA and the UK's Catapult Centres provide successful models.

Australia should target output-focused metrics such as digital adoption, AI capability and collaborative R&D participation to measure the impact of investments and foster accountability. Our *'Breaking Barriers'* research shows that increasing alternative pathway hiring to 20 per cent could boost productivity by 14 per cent across Australian businesses.

### **Conclusion**

Australia has a once-in-a-generation opportunity to lead in the global digital economy by aligning structural reforms with scalable digital capability, responsible AI and long-term talent investment. The Commission's reform blueprint sets the right foundation. To realise its full potential, cross-sector collaboration, targeted funding and bold leadership will be essential.

Accenture stands ready to support the Australian government and its partners in executing this vision. With deep expertise in technology transformation, regulatory design and human-centred innovation, we look forward to co-creating a more productive, inclusive and resilient economy for all Australians.

## Introduction

Accenture welcomes the Productivity Commission's (the Commission) insightful and ambitious series of Interim Reports outlining a national reform agenda focused on lifting productivity through innovation, digital technology, workforce adaptability and integrated care. Collectively, these reports present a coherent and forward-looking vision for how Australia can harness the transformative potential of artificial intelligence (AI), data and regulatory reform to drive sustainable economic growth and societal well-being.

Drawing on Accenture's deep global experience across digital transformation, AI development, regulatory technology and workforce enablement in both public and private sectors, this submission provides a detailed response to the Commission's recommendations. Our intent is to support informed policy development by highlighting practical opportunities for implementation, particularly how proven solutions and international case studies can help realise Australia's aspirations.

Australia stands at a pivotal moment in its economic transformation. Advances in digital technologies, especially in AI, cloud computing, data analytics and automation are reshaping productivity dynamics across all industries. However, Australia's ability to harness these technologies at scale remains hindered by fragmented digital infrastructure, uneven workforce capability and regulatory frameworks not yet fully aligned with the realities of a fast-evolving digital economy.

In today's competitive global landscape, productivity growth will rely not just on the adoption of new technologies, but on the effectiveness with which these tools are integrated into everyday business and government operations. This must be supported by a digitally skilled workforce and enabled by co-ordinated, future-ready regulation. Nations that are building robust digital ecosystems, closing capability gaps between large and mid-sized enterprises and fostering innovation through sustained public-private collaboration are already unlocking significant economic value. For Australia, this represents both a challenge and a once-in-a-generation opportunity.

As the global economy shifts further towards digital, Australia's competitiveness and resilience will increasingly depend on how well it invests in the foundations of digital productivity including sovereign infrastructure, innovation ecosystems, workforce skills and adaptive regulation. Other advanced economies are making rapid progress in these areas. Countries such as South Korea, Finland and Germany are integrating national productivity strategies with digital adoption goals, demonstrating the value of co-ordinated investment in skills, technology and innovation governance. These global examples offer critical lessons that Australia can apply.

Accenture recognises that productivity is a whole-of-economy challenge and supports the development of a national strategic blueprint that leverages Australia's natural strengths while addressing regional, demographic and industry-specific needs. As a long-standing advisor and implementation partner to government on complex technological change, we bring first-hand insights into the capabilities required to deliver successful transformation at scale. For this submission, we focus on two key levers of national productivity: technology adoption and digital skills development, where policy leadership can accelerate impact.

Historically, many technology investments in Australia have sustained performance rather than transformed it. Today, the emergence of advanced tools, particularly generative AI, offers an inflection point. Accenture's modelling suggests that generative AI could influence up to 45 per cent of work hours, enabling significant time savings, improved service quality and productivity gains of up to ten percentage points across sectors.

By focusing on strategic, responsible deployment of these technologies supported by the right infrastructure, skills and regulatory frameworks, Australia has a unique opportunity to not only improve national productivity but also shape a more inclusive, competitive and resilient economy for the future.

## First Interim Report: Creating a More Dynamic and Resilient Economy

The Commission's proposed overhaul of Australia's corporate tax and regulatory framework presents a powerful opportunity to stimulate investment, drive innovation and build economic resilience, particularly for technology and AI-led enterprises.

The recommendation to reduce the company income tax rate to 20 per cent for firms with annual turnover under A\$1 billion is a critical step toward incentivising reinvestment in infrastructure, workforce development and Research & Development (R&D). This is especially impactful for technology companies, where large upfront costs are often a prerequisite for long-term innovation and competitiveness.

Accenture's own 'Finance Transformation' journey illustrates the power of such reinvestment: by deploying advanced analytics, machine learning and predictive AI across finance operations, we elevated our forecasting accuracy, shortened financial cycle times and improved capital allocation decisions, demonstrating how lower tax burdens could further amplify such initiatives<sup>1</sup>.

Complementing this is the proposed five per cent net cashflow tax, which allows businesses to immediately expense capital investments, particularly in cloud infrastructure, proprietary software, computing hardware and AI development. This approach directly addresses the common capital deployment challenges faced by digital businesses, accelerating the adoption of emerging technologies and enabling rapid scaling of AI solutions<sup>2</sup>.

Accenture's global experience supports this strategic direction. For example, in partnership with Quantexa, Accenture has enabled government and revenue agencies to deploy predictive AI models that detect tax fraud at scale, improving data integrity and minimising financial risk. Additionally, Accenture's AI Refinery platform delivers modular, industry-specific AI capabilities including fraud detection agents that can be rapidly deployed in domains such as financial services. These efforts underscore the impact of supportive fiscal environments in accelerating innovation, compliance and capital deployment<sup>3</sup>.

The Commission's emphasis on reducing regulatory burden through measurable reform, independent oversight and consistent policy implementation is particularly well-timed. Accenture's long-standing advocacy in this space through partnerships such as our RegTech for Regulators initiative with the World Government Summit exemplifies how digital tools can modernise oversight, enabling real-time, data-driven regulatory enforcement that both fosters innovation and manages risk<sup>4</sup>.

---

<sup>1</sup> 'The new numbers game: Accenture's Finance transformation. Using data-centric continuous reinvention to drive our Finance strategy', 20 December 2023 [Accenture's Finance Transformation | Case Study | Accenture](#)

<sup>2</sup> 'How AI is changing infrastructure and capital projects' Accenture. [Infrastructure & Capital Projects | Accenture](#)

<sup>3</sup> 'Quantexa and Accenture Work Together to Help End Tax Fraud' Quantexa [Quantexa and Accenture Work Together to Help End Tax Fraud](#)

'Accenture case study V360 awards: 'Celebrating innovation with our clients' Accenture [Celebrating Innovation With Our Clients | Accenture](#)

'Generative AI in Action: Opportunities & Risk Management in Financial Services', UK Finance and Accenture, January 2025 [Generative AI in Action: Opportunities & Risk Management in Financial Services | Policy and Guidance | UK Finance](#)

<sup>4</sup> 'New Report from Accenture and the World Government Summit Finds That Regulators Must Embrace RegTech to Keep Pace with Digital Disruption' Accenture, 12 February 2018 [New Report from Accenture and the World Government Summit Finds That Regulators Must Embrace RegTech to Keep Pace with Digital Disruption](#)

Further, Accenture's international experience, including successful collaborations with governments in Singapore, Canada and the Nordics demonstrates that embedding innovation-centric KPIs within regulatory bodies fosters more adaptive, collaborative and responsive environments. In Singapore for example, Accenture, in partnership with the Economic Development Board, launched an Analytics Innovation Centre, serving as a research and innovation hub for public and private sector clients to develop actionable, analytics-driven public services and governance insights. Additionally, Accenture opened the Innovation Centre for Situational Awareness to support public safety agencies in developing AI-driven solutions for risk anticipation and response, highlighting the role of collaborative innovation in strengthening public-sector capabilities<sup>5</sup>.

Regulators in these jurisdictions have shifted from traditional gatekeeping roles to becoming enablers of innovation, accelerating policy feedback loops and fostering public-private co-creation. These experiences provide a compelling model for Australia's proposed Office of Impact Analysis and broader whole-of-government regulatory reform strategy.

A recent national survey by Liquid Interactive and The Mandarin<sup>6</sup>, involving over 600 public servants, reveals strong individual readiness for AI adoption across the Australian Public Service. While 84 per cent feel personally ready to use AI, only 25 per cent believe their agency is ready to scale it. This points to a significant gap between individual enthusiasm and organisational preparedness.

Public servants see AI as a practical tool to reduce administrative burden, streamline workflows and improve efficiency. Operational use cases dominate, with 42 per cent identifying administration reduction as the top AI investment priority, followed by customer outcomes (25 per cent), data-led decision-making (20 per cent), and compliance (14 per cent). Generative AI tools like ChatGPT and Copilot are already in use by 30 per cent of respondents, showing strong grassroots engagement.

According to the survey, despite this momentum, current governance frameworks are poorly understood and not widely championed, creating a risk of fragmented, unsustainable implementations. Public servants are ready to lead and experiment but require clearer guidance, fit-for-purpose tools and organisational support. The report calls for high-visibility 'beacon' projects and stronger leadership to align individual readiness with systemic transformation, positioning AI as a low-risk, high-impact lever for public sector productivity.

Tax and regulatory reforms alone are insufficient without parallel investment in Australia's digital infrastructure. Productivity gains are closely tied to the quality of national digital systems, including high-speed connectivity, robust cloud capabilities, interoperable data frameworks and secure AI-enabled platforms.

Accenture's 'Technology Vision 2025'<sup>7</sup> research identifies five imperatives to maximise value from AI and digital transformation:

1. Lead with value;
2. Reinvent talent and ways of working;

---

<sup>5</sup> 'Accenture Opens Innovation Center for Situational Awareness in Singapore', Accenture 20 January 2020 [Accenture Opens Innovation Center for Situational Awareness in Singapore](#)

<sup>6</sup> 'Let's Get Real about AI: Insights from the first national survey on public sector attitudes towards AI', Liquid Interactive and The Mandarin, August 2025

<sup>7</sup> 'Technology Vision 2025, AI: A Declaration of Autonomy. Is trust the limit of AI's limitless possibilities?', 7 January 2025 [Technology Trends 2025 | Technology Vision | Accenture](#)

3. Build an AI-enabled, secure digital core;
4. Close the gap on responsible AI; and
5. Drive continuous reinvention.

The real power of AI lies in its capacity to learn from and optimise all aspects of operations. When deployed with intention and trained methodically, AI can act as a ‘cognitive digital brain’ a central system that connects enterprise siloes, enables autonomous decision-making and drives end-to-end transformation<sup>8</sup>.

This concept of a digital nervous system, already in place at some of the world’s largest and most advanced organisations, supports enterprise-wide adaptability, resilience and real-time responsiveness to disruption. However, this transformation brings with it increased vulnerability. As such, building a fit-for-purpose digital core, one that is secure, cloud-first, and AI-ready is essential. It provides the foundation for reducing technical debt, enabling agile service delivery and safeguarding national digital assets<sup>9</sup>.

Insights from over 2,000 generative AI client engagements and 3,000 executive interviews globally show that companies embracing all five imperatives are 2.5 times more likely to achieve enterprise-level AI impact. These findings underscore the importance of integrated digital strategy and co-ordinated, cross-sector efforts<sup>10</sup>.

Notably, Accenture’s recent research in Europe highlights a growing divide in AI adoption between large multinationals (revenues > US\$10B) and mid-sized companies (US\$1B–\$9.9B)<sup>11</sup>. The largest companies are more than three times as likely to have embedded autonomous AI agents, giving them a significant edge in automation, operational efficiency and intelligent decision-making.

Bridging the AI adoption gap among European businesses presents a substantial economic opportunity. Accenture’s research indicates that if all European companies with annual revenues over €1 billion were to elevate their AI capabilities to match those of leading industries, the region could unlock approximately €200 billion in additional annual business revenues<sup>12</sup>. This uplift is comparable to the entire GDP of Hungary.

The potential impact is particularly pronounced in capital-intensive sectors such as manufacturing, energy, telecommunications and utilities, where AI-driven innovation can significantly enhance productivity, efficiency and competitiveness<sup>13</sup>.

These sectors, key contributors to Australia’s own economy, stand to benefit enormously from targeted AI investment. As the Commission notes, empowering these industries through supportive tax, training and infrastructure policies will deliver outsized returns in productivity and long-term economic resilience.

---

<sup>8</sup> Ibid 7

<sup>9</sup> Reinventing with a digital core: Chapter 1: How to accelerate growth through change’ Accenture, 16 July 2024

[Reinventing with a Digital Core | Tech Infrastructure | Accenture](#)

<sup>10</sup> Accenture: ‘Europe’s AI reckoning: Reinventing industries for a new era’ 2025, p. 7. [Europe’s AI reckoning: New Era for Industries | Part A](#)

<sup>11</sup> Ibid 10, p. 9

<sup>12</sup> ‘Accenture Report: European Firms Must Accelerate AI Adoption to Close Productivity Gap’, 26 June 2025 [Accenture Report: European Firms Must Accelerate AI Adoption to Close Productivity Gap](#); ‘Europe lagging behind US in AI arms race, warns Accenture report’ Consultancy.eu

<sup>13</sup> Europe Is Falling Behind in the AI Arms Race, Accenture Sounds the Alarm’, AI Consultancy News, 26 August 2025 [Europe Is Falling Behind in the AI Arms Race Accenture Sounds the Alarm](#)

The reforms proposed in the First Interim Report create a strategically coherent and highly investable policy environment. They provide strong incentives for companies like Accenture and the wider technology ecosystem to expand digital operations, deepen AI capabilities and contribute to Australia's long-term economic resilience.

By aligning tax, regulatory and digital infrastructure policy, the Commission's vision supports an innovation-led economy that is both agile and secure. Accenture looks forward to actively supporting the implementation of these reforms and co-designing technology solutions that deliver measurable national benefit.

## Third Interim Report: Harnessing Data and Digital Technology

The Commission's recommendation for a technology-neutral, outcomes-based approach to AI regulation aligns with international best practice and represents a mature response to managing the risks of emerging technologies without stifling innovation. By prioritising the review of existing legal frameworks before introducing new AI-specific regulation, the Commission aims to mitigate legal uncertainty, a major challenge faced by AI developers and adopters globally.

Accenture's global experience working with highly regulated sectors such as financial services and healthcare demonstrates that regulatory clarity combined with flexibility allows for faster deployment of AI solutions. For example, AI systems supporting fraud prevention, clinical decision-making and customer engagement have scaled effectively when embedded within clear, risk-based regulatory environments.

Importantly, the Commission's decision to defer mandatory guardrails for high-risk AI systems until comprehensive policy reviews are concluded helps preserve an essential space for innovation. In sensitive fields such as healthcare diagnostics and algorithmic finance, this avoids prematurely curbing development and encourages responsible experimentation.

Data access reform is positioned as a foundational driver of productivity. The proposal to establish low-cost, sector-specific pathways for data portability, complementing existing frameworks like the Consumer Data Right (CDR) will reduce compliance costs and accelerate innovation. This mirrors Accenture's global work building real-time data sharing ecosystems using API frameworks and user-centric controls, particularly in collaboration with financial institutions and public sector agencies<sup>14</sup>.

The proposal to mandate machine-readable digital financial reporting using XBRL is another critical reform. It promises efficiencies in compliance, transparency and regulatory oversight. Accenture's fintech clients, including those in Europe and Asia-Pacific, have leveraged similar initiatives to automate workflows, improve decision-making and reduce reporting burdens ensuring greater financial accountability while freeing resources for innovation.

Outdated regulation remains one of the top barriers to digital adoption. Business leaders require clarity and confidence to invest in frontier technologies, while regulators must evolve their toolkits to keep pace with rapid change. Australia's strategic opportunity lies in building regulatory frameworks that are coherent, future-ready and globally aligned.

---

<sup>14</sup> 'APIs for future systems', Accenture [accenture-apis-for-future-systems-mulesoft-pov-final.pdf](#)

As international competition intensifies, particularly in AI and cloud, nations like those in the EU are taking bold steps to assert digital sovereignty. The European Union has acknowledged its over-reliance on foreign infrastructure, with US companies accounting for over 70 per cent of foundational AI models since 2017 and 65 per cent of EU cloud services<sup>15</sup>. In response, France and Germany have backed initiatives such as Eurostack and Gaia-X<sup>16</sup>, public-private collaborations that establish sovereign, compliant and interoperable infrastructure to support innovation and industrial resilience.

Australia can adopt a similar approach by streamlining regulation across AI, privacy, cybersecurity and data governance providing companies with confidence to invest, collaborate and innovate.

To lift national productivity, Australia must double down on public-private partnerships (PPPs) that accelerate the translation of R&D into real-world solutions. As technology continues to reshape global industries and public services, collaborative innovation ecosystems are essential for scaling breakthrough ideas. Co-investment in shared digital infrastructure, regulatory sandboxes and national data platforms can enable the development and safe deployment of AI in areas like healthcare, logistics, education and defence.

Government's role in de-risking early-stage investment is critical. Through challenge-based procurement pathways, capability hubs and innovation funds, emerging tech companies, particularly Small to Medium Enterprises (SMEs) can be supported in bringing transformative products to market. Accenture's own experience co-developing AI platforms in PPPs demonstrates the immense value of early government engagement in innovation delivery and regulatory validation<sup>17</sup>.

Australia's productivity strategy should formally embed collaborative innovation as a core capability. This includes setting bold R&D investment targets, applying innovation metrics to major programs and incentivising cross-sector experimentation to solve national challenges. Such a shift would not only improve public service delivery but also position Australia as a global leader in critical technologies like AI, quantum computing, robotics and cybersecurity.

Australia's current R&D investment sits below the OECD average<sup>18</sup>, despite growing urgency to strengthen national capabilities. Accenture recommends embedding output-focused metrics, including AI deployment rates, digital maturity scores and R&D-commercialisation outcomes into the national productivity strategy. These should be tied to measurable economic outputs, such as efficiency gains, service transformation and export growth.

Global examples show that measurable goals aligned with national interest are powerful drivers of impact. In South Korea, public R&D investment exceeding four per cent of GDP has been used to enhance competitiveness in semiconductors and AI resulting in tangible productivity improvements<sup>19</sup>. In Finland, the Research and Innovation Council sets national targets linking digitalisation with economic resilience<sup>20</sup>.

<sup>15</sup> Ibid 10, p. 32.

<sup>16</sup> Ibid 10, p. 32

<sup>17</sup> 'Accenture Federal Services Launches 'Federal AI Solution Factory' with Google Public Sector:

Collaborative Hub to Rapidly Prototype and Pilot AI-Powered Solutions for Federal Agencies Signals Next Phase in Strategic Alliance', Accenture, 15 October 2024 [Accenture Federal Services Launches 'Federal AI Solution Factory' with Google Public Sector](#)

'Accenture Delivers Cloud-Based Solution to Help Regions Bank Enhance PPP Loan Application and Forgiveness Processes', Accenture, 30 March 2021 [Accenture Delivers Cloud-Based Solution to Help Regions Bank Enhance PPP Processes](#)

<sup>18</sup> 'Australia's R&D Investment Decline Prompts Urgent Call for Reform', Auspreneur, Bibi Zuhra, 13 February 2025: [Australia's R&D Investment Decline Prompts Urgent Call for Reform - Auspreneur](#)

<sup>19</sup> 'Korea ranks second globally in R&D investment with 119 trillion won expenditure' ChosunBiz, 29 December 2024

<sup>20</sup> 'Government Report Finland's Digital Compass 2022:72 [Government report: Digital Compass](#)

Meanwhile, Germany's High-Tech Strategy and Industry 4.0 initiatives directly tie SME digital adoption to export performance and sectoral competitiveness.

These nations demonstrate that linking innovation investment to key performance indicators such as patents, skills development and AI uptake can strengthen accountability and catalyse productivity. Australia can adapt these models by setting benchmarked national targets that track the impact of innovation on core economic and social outcomes.

Accenture acknowledges the progress made through the Australian government's *'Safe and Responsible AI in Australia'* consultation. However, persistent regulatory fragmentation and uncertainty continue to impede investment and deployment. To address this, Australia should harmonise regulatory frameworks across AI, data governance, cybersecurity and privacy ensuring clear, navigable compliance pathways.

A practical next step for the government is to support the operationalisation of Responsible AI by partnering with industry and equipping businesses with practical toolkits for risk assessment, testing and ongoing monitoring. These tools could be modelled on the government's own GovAI platform, which enables the safe and rapid deployment of AI across the public sector. In parallel, the government should explore opportunities to improve safe and secure public data sharing with accredited users and provide targeted AI catalyst support to encourage the responsible development of AI in critical sectors such as health, aged care and social services.

Accenture's research with Stanford University and AWS highlight that operationalising Responsible AI is not only essential to managing risk and ensuring compliance, but also to unlocking AI's full economic and societal value. Organisations with mature Responsible AI capabilities are better positioned to deliver innovation, increase productivity and avoid costly incidents such as bias, data breaches and reputational damage. Australian research reinforces this, showing that the public expects stronger regulation and oversight, particularly in relation to job security and the protection of personal data. While AI usage is growing in workplaces, confidence in enterprise-provided AI systems remains low.

By investing in Responsible AI frameworks that are transparent, accountable and embedded across the AI lifecycle, the government can help build public trust, foster safe and responsible AI adoption, and position the nation to lead in AI innovation under emerging global regulatory and ethical standards<sup>21</sup>.

These reforms align directly with Australia's national interests. By building sovereign digital capabilities, increasing public trust in regulation and commercialising home-grown intellectual property, Australia can secure its place in the global digital economy.

### *Position on AI Law Reform*

Accenture supports the sector-specific, light-touch approach to AI regulation, which aligns closely with the Commission's position on law reform. We believe this model offers the flexibility, responsiveness and innovation-enabling environment needed to keep pace with the rapid evolution of AI technologies, without creating unnecessary regulatory burdens, particularly for start-ups and SMEs.

Rather than introducing a broad and potentially rigid standalone AI Act, this approach focuses on incremental reform of existing legislative frameworks, such as privacy, anti-discrimination and consumer protection laws. This allows for targeted adaptation to AI-related challenges while avoiding duplication or

<sup>21</sup> 'From compliance to confidence Embracing a new mindset to advance responsible AI maturity' Accenture, 11 December 2024 [From compliance to confidence: Embracing a new mindset to advance responsible AI maturity](#); 'Thrive with responsible AI: How embedding trust can unlock value' Accenture, 29 November 2024 [Thrive with responsible AI](#)

overlap with current legal obligations. Accenture agrees that such a model is better suited to Australia's unique legal and economic context, supporting both responsible innovation and regulatory clarity across sectors.

We also support the use of innovation-enabling mechanisms such as regulatory sandboxes, voluntary codes of conduct and safe harbour provisions. These tools allow companies like Accenture to responsibly trial AI solutions in real-world settings, while still aligning with ethical, legal and social expectations. This pragmatic and principles-based approach provides the agility required to manage AI risks as they emerge, while promoting trust, accountability and long-term competitiveness in the digital economy.

In line with the Commission's recommendations, Accenture advocates for a balanced regulatory framework, one that fosters innovation and economic growth while addressing risks through existing legal protections and strong governance principles. We are committed to collaborating with government, industry and civil society to ensure Australia remains globally competitive while upholding public confidence in the safe and ethical use of AI.

## Fourth Interim Report: Building a Skilled and Adaptable Workforce

The Commission's focus on foundational skills, modernising education delivery and creating flexible learning pathways is essential for equipping Australia's workforce to meet the demands of a rapidly changing economy. Declining literacy and numeracy levels among school leavers highlight a systemic challenge. The proposed national digital platform for curriculum support offers a timely solution, enabling access to innovative, AI-driven educational technologies.

Globally, Accenture has a strong track record in delivering AI-enabled learning platforms that support personalisation and efficiency in education and training, though not necessarily through traditional intelligent tutoring systems. For example, Accenture recently launched 'Accenture LearnVantage'<sup>22</sup>, an AI-powered platform that personalises learning pathways, accelerates reskilling and helps reduce time-to-proficiency for enterprise workforces.

In addition, Accenture has highlighted the transformative role of generative AI in education<sup>23</sup>, noting its potential to scale personalised tutoring and simulations in ways that were previously cost-prohibitive. These AI-driven tools can support learners 24/7, offering targeted assistance and self-directed progress. Accenture has also deployed immersive learning experiences<sup>24</sup> using extended reality (XR), partnering with platforms like Talespin to enhance workforce engagement through virtual reality simulations. While these initiatives have primarily focused on workforce development, they demonstrate Accenture's broader capability to implement scalable, adaptive learning technologies that ease instructional burdens and improve learner outcomes.

The Commission's proposed national edtech and AI strategy, with a focus on quality assurance and centralised procurement, aligns well with Accenture's experience advising governments on scaling digital education platforms. Establishing quality frameworks and standardised digital resources ensures equitable

---

<sup>22</sup> 'Accenture Launches 'Accenture LearnVantage' to help clients and their people gain essential skills and achieve greater business value in the AI economy', Accenture, 5 March 2024: [Accenture Launches Accenture LearnVantage to Help Clients and Their People Gain Essential Skills and Achieve Greater Business Value in the AI Economy](#)

<sup>23</sup> 'Building skills at scale with generative AI Embracing a new era of learning and development', Accenture, 16 October 2024: [Building Skills at Scale With Generative AI | Accenture](#)

<sup>24</sup> 'Engage, immerse and inspire with Extended Reality: Immersive Learning with XR', Accenture, [Immersive Learning | Accenture](#)

access, especially for students in regional and underserved areas, and helps accelerate the transition to a more inclusive and digitally enabled education system.

One of the most forward-thinking initiatives proposed is the creation of a national database for credit transfer and recognition of prior learning (RPL). This database would capture formal qualifications, micro-credentials, informal learning and industry experience supporting seamless movement between education, training and employment. Accenture has developed AI-powered skills-matching and learner recommendation engines to support this transition, helping reduce skill mismatches and enabling a more dynamic and mobile workforce<sup>25</sup>.

The Commission's emphasis on lifelong learning and workforce development, supported by tax incentives and advisory services for SMEs, is also critical. Accenture has designed scalable, personalised upskilling platforms and workforce analytics tools that help SMEs upskill employees quickly and efficiently<sup>26</sup>. These tools directly support productivity gains by enabling targeted learning, just-in-time training and data-driven insights on workforce capability.

Further reforms to occupational entry regulations, including digitised credentialing and competency-based licensing, provide an opportunity for greater innovation. Accenture has piloted AI-based competency assessment and digital qualification platforms in multiple jurisdictions, which enable cross-border recognition of skills and streamline workforce accreditation processes<sup>27</sup>.

However, closing Australia's digital skills gap will require long-term investment beyond short-term programs. A skilled workforce is the cornerstone of digital transformation. Gaps in AI, data literacy and cybersecurity competencies are growing and must be addressed through sustained investment in talent pipelines, digital capability programs and workforce transition strategies.

Generative AI and other advanced technologies offer immense potential to boost productivity but only when implemented with a human-centred strategy. Rather than displacing workers, these technologies should empower them, fostering a culture of trust, adaptability and continuous learning. This is not simply about efficiency; it is about unlocking human potential at scale.

According to Accenture's modelling, organisations that adopt responsible, people-first approaches to generative AI can unlock an additional USD10.3 trillion in global economic value by 2038<sup>28</sup>. The key differentiator for high-performing companies is the integration of people, data and technology. Our research shows that businesses that strengthen all three of these areas outperform others significantly in terms of productivity, agility and resilience.

For example, high-productivity companies are 33 per cent more likely to view continuous workforce training as a core driver of success. They take a strategic approach to talent development, aligning employee capability with emerging technologies and long-term business goals. These organisations focus not only on current job roles but also prepare their people for the reimagined roles of the future.

Further research confirms that companies that integrate data, technology and workforce capability achieve a 2.8 times productivity premium compared to those that focus only on digital infrastructure<sup>29</sup>.

<sup>25</sup> Ibid 21, 'Accenture and ETS Create a New Global Model for Talent Management Centered Around Skills-Based Job Readiness' Accenture, 18 November 2024 [Accenture and ETS Create a New Global Model for Talent Management Centered Around Skills-Based Job Readiness](#)

<sup>26</sup> Ibid 21, 22, 23, 24

<sup>27</sup> Ibid 24

<sup>28</sup> Accenture, 'The Productivity Payoff: Unlock competitiveness with gen AI', 28 October 2024, p. 27 [The Productivity Payoff | Accenture](#)

<sup>29</sup> Accenture, 'The CHRO as Growth Executive: Focusing the power of data, tech and people to accelerate reinvention and a new vision for growth', 2023 [The Journey to Operations Maturity | Accenture](#)

Success lies in supporting people with the right tools, fostering curiosity and creating the conditions for ongoing learning. Leaders must model these behaviours, providing clarity of direction and psychological safety that allows teams to take risks, explore new skills and adapt to change.

In a fast-evolving economy, workforce development is not optional, it is essential. Nearly 95 per cent of C-suite leaders surveyed globally by Accenture expect to increase investments in employee skilling. However, to be effective, these efforts must be strategically future-focused<sup>30</sup>. Rather than addressing today's gaps alone, organisations must prepare employees for the next three to five years, using predictive analytics and scenario planning to shape learning and development strategies.

Creating a learning culture is critical. Employees must be given time, support and psychological safety to engage in meaningful upskilling. Business and government alike must protect learning time, embed lifelong learning into career progression and incentivise innovation through continuous capability development.

Accenture strongly supports the development of regional innovation hubs that connect industry, academia and government to deliver inclusive digital transformation. This model is already working globally. In the UK, Catapult Centres like Digital Catapult bring together universities, tech companies and government to drive adoption of technologies such as AI, 5G and immersive media<sup>31</sup>. In the US, programs like Manufacturing USA and the Regional Tech Hubs Program, with examples such as MxD in Chicago and ARM in Pittsburgh support localised prototyping, digital skills training and industrial transformation<sup>32</sup>.

Locally, Accenture's investment in a state-of-the-art Technology and Operations Centre at Federation University's Mount Helen Technology Park in Ballarat exemplifies our commitment to regional workforce development<sup>33</sup>. The centre will create high-value employment in software engineering, cybersecurity, operations and business services. These types of projects underscore the need for government and industry to co-invest in inclusive and regionally balanced growth.

Generative AI and automation will only drive productivity if Australia's workforce is equipped to adapt. That means prioritising long-term talent investment strategies focused on career transitions, continuous learning and inclusive upskilling pathways. Leading organisations are already treating workforce development as a strategic productivity lever and national policy should follow suit.

Accenture's deep engagement with the NSW Digital Skills Compact<sup>34</sup> and our commitment to alternative talent pathways provide a replicable model. Our recent report, '*Breaking Barriers*'<sup>35</sup>, shows that if 20 per cent of national hiring were done through alternative pathways, Australian businesses could realise up to a 14 per cent productivity uplift. We strongly recommend the national adoption of this pledge to accelerate talent inclusion and productivity.

---

<sup>30</sup> Accenture, 'Productivity: The next competitive edge: A breakthrough in managing costs', 2023, p.10 [Productivity: The Next Competitive Edge Report | Accenture](#)

<sup>31</sup> 'The Innovate UK Catapult Network' [Innovation Launchpad Network](#)

<sup>32</sup> 'MxD is a testbed for the factory of the future: Institute empowers manufacturers in the digital age: Manufacturing USA, 20 May 2025 [MxD Is a Testbed for the Factory of the Future | Manufacturing USA](#)

<sup>33</sup> 'Accenture to open Ballarat hub', ARN, 4 February 2025: [Accenture to open Ballarat hub – ARN](#)

<sup>34</sup> 'Employers sign on for alternative pathways to digital careers: Leading employers and government agencies are committing to skills-based hiring', Department of Education, NSW government, 12 August 2025 [Employers sign on for alternative pathways to digital careers](#)

<sup>35</sup> 'Breaking barriers, building connections Generative AI's role in the semiconductor industry': Accenture, 6 March 2024 [Breaking Barriers, Building Connections | Report | Accenture](#)

## Fifth Interim Report: Delivering Quality Care More Efficiently

The fifth interim report rightly identifies the care economy as a critical sector for reform, given Australia's demographic shifts and rising demand for high-quality, efficient and sustainable care services. The proposed reforms, including a unified care workforce registration system, national worker screening, streamlined provider accreditation and consistent digital governance frameworks represent a strategic shift toward an integrated, technology-enabled care system.

The introduction of a national care workforce register and screening platform will be fundamental in improving workforce mobility, reducing duplication and ensuring safety across aged care, disability support, veterans' care and early childhood education. Accenture's experience implementing AI-driven identity verification, credential tracking and risk analytics provides a strong precedent for such reform. For example, in the UK's National Health Service (NHS), Accenture delivered AI-powered systems that automated credential verification and flagged compliance risks enhancing workforce integrity and improving patient safety outcomes.

Similarly, the proposal to consolidate provider accreditation and auditing onto digital platforms offers a powerful opportunity to introduce automation and predictive analytics into compliance and oversight. Globally, Accenture has deployed AI-enabled tools to streamline these workflows, allowing health regulators to conduct real-time risk assessments, reduce administrative overhead and improve service provider performance. These digital audit platforms support transparency and strengthen trust in care delivery.

The establishment of a centralised data repository with standardised quality and safety metrics can serve as the backbone of an integrated care system. Such a repository enables advanced cross-sector analytics, real-time benchmarking and outcome forecasting. Drawing on our experience building large-scale health data platforms and predictive analytics tools, Accenture can support the government in designing and operationalising this infrastructure to inform policy, target interventions and optimise resource allocation.

Accenture also welcomes the proposal for consistent AI governance across care sectors. Ethical and responsible AI deployment is essential in sensitive environments such as health and aged care. Our global work in responsible AI, including frameworks that support fairness, transparency and accountability, ensures that technology enhances rather than replaces human care. In integrated care models, such as those involving Local Hospital Networks, Primary Health Networks and Aboriginal Community Controlled Health Organisations, AI-enabled data sharing and population health analytics can enable smarter commissioning and targeted resource planning.

The introduction of flexible funding models, supported by real-time scenario modelling and financial tracking, also has strong alignment with Accenture's capabilities. For example, we have built tools for governments that apply AI to model future funding scenarios, evaluate intervention efficacy and measure return on investment, ensuring the sustainability and effectiveness of public expenditure.

The Commission's support for the National Prevention Investment Framework further illustrates a forward-looking approach. Early intervention strategies are essential in mitigating downstream care costs and improving quality of life. Accenture has developed AI-powered risk prediction models and program evaluation tools to support similar frameworks worldwide. These enable longitudinal analysis and evidence-based program design, enhancing impact and transparency.

Global case studies illustrate how these reforms can be implemented in practice:

- **AI for Elder Care:** In the UK, Accenture developed a voice-activated AI platform for older adults using Amazon Echo Show, providing personalised care reminders and well-being suggestions. The system empowered users and supported caregivers by alerting them to behavioural anomalies creating a proactive and user-centric care experience<sup>36</sup>.
- **Population Health Analytics:** In the US, we partnered with Catholic Health Initiatives to deploy population health analytics tools that improved risk stratification, cost control and care outcomes for the elderly and chronically ill. Additionally, Accenture and AWS collaborated to build a longitudinal patient database of over 54 million records, supporting integrated care planning and data-driven decision-making<sup>37</sup>.
- **Predictive Health Models:** Our PropheSee™ platform, developed with CCS, applied advanced analytics to improve treatment adherence among high-risk diabetic patients, increasing adherence by up to 50 per cent<sup>38</sup>.
- **Process Automation:** Robotic Process Automation (RPA) deployed for a national health insurance provider significantly reduced onboarding and contract management costs improving operational efficiency in compliance-heavy environments.
- **Interoperable Data Systems:** Accenture's partnership with Boston Scientific and Oracle led to the creation of a data lake integrating multi-source patient data enabling seamless information sharing and personalised health workflows<sup>39</sup>.
- **API-Enabled Health Platforms:** In Singapore, we worked with IHiS and Google Cloud to create an API-first healthcare ecosystem, improving population health outcomes, clinician productivity and secure real-time data exchange across the public care network<sup>40</sup>.
- **Clinical Task Automation:** Through our 'Care Reinvention' program, Accenture introduced clinical robotics and task digitisation to improve EMR effectiveness and scale population health services<sup>41</sup>.
- **Advanced Analytics Infrastructure:** Our Advanced Health Analytics Platform (AAHAP) enables clients to surface operational insights through disruptive analytics supporting innovation in care planning and delivery.

These global implementations align directly with the reform goals outlined in the Commission's report. They demonstrate how digital infrastructure, AI and data interoperability can improve efficiency, enhance care quality and support a sustainable, person-centred care economy in Australia.

<sup>36</sup> 'Accenture Uses Artificial Intelligence to Help the Elderly Better Navigate Their Care and Improve Their Well-Being' Accenture, 28 November 2017, [Accenture Uses Artificial Intelligence to Help the Elderly Better Navigate Their Care and Improve Their Well-Being](#)

<sup>37</sup> 'Creating the Right Patient Outcomes with Amazon HealthLake and Accenture Health Analytics', Amazon Partner Network Blog, 7 November 2023: [Creating the Right Patient Outcomes with Amazon HealthLake and Accenture Health Analytics | AWS Partner Network \(APN\) Blog](#)

<sup>38</sup> 'Turning a wealth of information into action for patients. CCS uses predictive AI to deliver comprehensive diabetes care', Accenture, 4 October 2024 [Predictive AI for Diabetes Care | CCS Case Study | Accenture](#)

<sup>39</sup> 'Transforming Healthcare with Accenture and Oracle Reinventing healthcare. From access through experience to outcomes' Accenture, 28 January 2016, [Transforming healthcare with Accenture and Oracle | Accenture](#)

<sup>40</sup> 'Singapore's iHiS taps Google Cloud, Accenture to drive healthcare innovation. They are extending API gateway access to allow developers to create new applications and capabilities for the healthcare system', Healthcare IT News, 15 February 2023 [Singapore's iHiS taps Google Cloud, Accenture to drive healthcare innovation | Healthcare IT News](#)

<sup>41</sup> 'Care Reinvention', Accenture, 23 January 2023 [Care Reinvention | Accenture](#)

## Conclusion

The Commission's Interim Reports collectively present a visionary yet pragmatic roadmap for Australia's economic transformation. The proposed reforms across taxation, regulation, workforce development, data governance and care delivery are timely and well-aligned with the realities of a digital and AI-enabled future. They recognise that productivity gains in the coming decades will be driven not solely by cost reduction or scale efficiencies, but by the smart integration of emerging technologies, the activation of a digitally skilled workforce and the creation of agile, trusted institutions that enable innovation.

Accenture strongly supports this reform agenda and believes that Australia now stands at a critical inflection point. The acceleration of AI, cloud computing, data-driven decision-making and automation presents a once-in-a-generation opportunity to reshape core industries, improve government services and create long-term national resilience. The challenge ahead is not only one of adoption, but of alignment: ensuring that digital tools are embedded in ways that are ethical, inclusive, secure and productivity-enhancing.

Our global experience shows that countries and organisations that invest in the right digital foundations: sovereign infrastructure; skills pipelines; interoperable data platforms; and outcomes-based regulation achieve significantly greater impact from technology adoption. Accenture's partnerships with public and private sector organisations in North America and Asia have demonstrated that targeted fiscal incentives, such as immediate expensing of AI and cloud investments, directly accelerate technology-driven productivity.

Throughout this submission, we have highlighted global case studies that show what is possible when policy, technology and talent come together:

- AI-powered regulatory sandboxes and intelligent compliance engines reducing burden in financial services and health sectors.
- Digital learning ecosystems and AI-enabled upskilling platforms transforming education and workforce participation.
- Predictive analytics and intelligent automation streamlining healthcare delivery and collaborative commissioning.
- National productivity strategies embedded with clear metrics, such as in Germany and South Korea, linking innovation investment to measurable economic outcomes.

These examples demonstrate that innovation-led productivity is achievable when structural reforms are supported by scalable digital capability and a long-term commitment to human capital development.

The Commission's proposals around flexible taxation settings, data portability, responsible AI and lifelong learning create the right policy foundation. But implementation will require close collaboration across government, industry, academia and civil society. It will require embedding digital responsibility into every stage of design and deployment, and investing not only in technology, but in the people and institutions that shape how it is used.

Accenture's own work in Australia from our contribution to the NSW Digital Skills Compact, to the establishment of a sovereign service and operations centre in Ballarat, reflects our deep commitment to inclusive digital growth. Our '*Breaking Barriers*' research has shown that expanding alternative hiring pathways could boost national productivity by up to 14 per cent. Our partnerships with education

providers globally have delivered personalised, AI-enabled learning at scale, supporting teacher workload reduction and improved student engagement. These examples are not theoretical. They are already delivering value and can be scaled nationally.

We strongly believe that digital transformation, when done responsibly and strategically, can unlock the next frontier of productivity. It is not just about driving efficiency, but about building the economic, social and institutional capability to thrive in a fast-changing world. High-performing organisations and governments recognise that the future of productivity is human-centric, data-rich and digitally enabled.

Australia has a rare window to build sovereign digital capacity, future-proof its workforce and position itself as a leader in the global AI and technology economy. With strong leadership, targeted investment and a commitment to collaborative execution, the nation can secure not only productivity gains, but lasting prosperity, equity and resilience.

Accenture looks forward to continuing to collaborate with the Commission, governments, industry leaders and communities to help translate this ambitious reform agenda into measurable and meaningful outcomes. Together, we can shape a future where every Australian has the tools, skills and confidence to participate fully in a thriving, productive digital economy.