

Date: 15 September 2025

Subject: Five Pillars of Productivity — Citizen Submission

Introduction — Accessibility, Transparency, Explainability

Thank you for the opportunity to contribute. The Commission's openness (including the 'Prodcasts' and published survey results of regulators and policymakers) models the stewardship culture Australia needs.

The Prodcasts were especially useful — I could walk in my local park, listen to every episode, and learn outdoors in the sunlight.

My submission rests on three principles:

- **Accessibility** — publish information in formats people can actually use.
- **Transparency** — explain, in plain language, how decisions and technologies are deployed.
- **Explainability** — go beyond “tick-the-box” compliance to show due diligence and earn trust.

Modern AI tools can now generate baseline, legislation- and PGPA-aligned risk assessments (Information Security Manual, Privacy Act, Archives Act, Commonwealth Risk Management Policy) in seconds, freeing public servants to spend more time engaging directly with Australians. (Plain-English note: I had to look up “promulgate” — this presents an opportunity to include important words like this in the Australian Curriculum.)

1) Creating a More Dynamic & Resilient Economy

Digital Financial Reporting (Box 2.7)

Recommendation: Amend the *Corporations Act 2001* and Corporations Regulations to mandate machine-readable digital financial reporting (remove PDF/hard-copy defaults).

Benefits: faster analysis, comparable KPIs across jurisdictions, more transparent markets, and improved accessibility for screen-readers and assistive technologies.

Embedding Stewardship (Information Request 2.5)

Recommendation: Use the Commonwealth Risk Management Policy (CRMP) to embed regulatory stewardship across APS agencies and, via Stage 2 APS reforms, extend stewardship across all PGPA entities. Practically: set clear risk tolerances, integrate risk into governance/performance, and communicate decisions in plain language — with stronger scrutiny of regulation and outcome-focused expectations for regulators.

Timing Gap Fix

Recommendation: Require AI-assisted Regulatory Impact Analyses at the options stage (before decisions) to support genuine consultation and reduce late rework.

2) Building a Skilled & Adaptable Workforce

Draft Rec 1.1 — National Lesson-Planning Platform

Recommendation: Build a national platform that:

- embeds the Australian National Dictionary (AND) as a core reference for authoritative Australian English (and for future AI trained on public assets),
- publishes in machine-readable formats with plain-language metadata for translation, text-to-speech, screen readers and analytics,
- includes rich “image explainers” (e.g., a Kookaburra stamp entry spans taxonomy, cultural significance, conservation status, history and structured tags),
- integrates coding and SSML modules so students learn correct pronunciation and how synthetic speech works (practical digital literacy against scams, deepfakes and psychological persuasion),
- supports outdoor education with structured visit packs to cultural institutions, botanic gardens and libraries (intro to Latin and plant taxonomy, environmental observation, fieldwork, endangered wattles),

- applies frameworks such as Howard Gardner’s multiple intelligences so content is delivered across modalities (visual, auditory, tactile, kinesthetic, interpersonal, intrapersonal, logical, naturalistic).

“Everything is data” for inclusion: one audio clip of a kookaburra can be converted into machine-readable assets — haptics (tactile feedback) for learners with hearing loss, or spectrogram overlays for visual learners — creating multiple pathways from a single source file.

Image/sound can drive varied lesson plans; one stamp image can be analysed by a Large Language Model (LLM) and become a 45-minute cross-curriculum lesson (e.g., science, First Nations language) in seconds. imagery provides an entry point into ecology, conservation, and national identity.



The koala is listed as an endangered species, so this single artefact can teach students about the fragility of ecosystems, the importance of biodiversity, and the role of symbols in shaping Australian identity. By publishing resources in machine-readable formats, with structured explainers and metadata, teachers could guide students to analyse the koala stamp across disciplines — language, science, history, and civics.

This demonstrates how a simple stamp can be transformed into a multi-layered digital learning object, future-proofed for accessibility and AI-driven analysis.

Guarding national language assets: The AND/ANDC¹ is enabling infrastructure for curriculum, research and AI benchmarking. Ongoing support anchors Australian English, Indigenous loanwords and national identity in education — and in the datasets that train our tools.

Continuity with Australian practice: *Lift Off!* (1992) mobilised hundreds of Australian creatives, grounded in Gardner’s research², and treated young children as reasoning learners. A modern platform should revive that “clever country”³ spirit using open standards and accessible formats.

Industry insight (skills, EQ & AI agents)

Modern AI “agents” give small teams and non-coders outsized leverage, while advanced users gain higher

¹ <https://slll.cass.anu.edu.au/centres/andc>

² <https://www.harvardmagazine.com/commencement/harvard-commencement-2024-harvard-school-education-speaker-howard-gardner>

³ <https://electionspeeches.moadoph.gov.au/speeches/1990-bob-hawke>

productivity outputs. As capability rises, EQ, judgment and leadership rise in value alongside technical skills. Wellbeing and human connection need to be the highest priority.

Draft Rec 1.2 — Equitable Access to EdTech/AI

Recommendation: National leadership to (i) align tools with accessibility standards and evidence-based pedagogy, (ii) benchmark AI on Australian sources (AND, Trove, Hansard), (iii) provide plain-language explainability for parents, students and teachers, and (iv) fund professional learning so AI reduces workload rather than adds to it.

Industry insights (education & human-first use)

Basic coding — increasingly supported by natural-language tools — is becoming a core literacy alongside critical thinking.

Draft Rec 2.1 (Workforce) — Credit Transfer & RPL

Support a national system of credit transfer and recognition of prior learning, with:

1. a right for applicants to have credit transfer/RPL assessed before offer-acceptance deadlines,
2. a national database of academic credit decisions (staged: start with credit-transfer decisions; expand to microcredentials, informal learning, domestic/international work experience),
3. a coordinated model for assessing prior learning (shared rubrics; transparent mapping to units/outcomes).

Role: The Australian Tertiary Education Commission should steward the database and enforce consistent, accurate provider data.

Technician Reality Check (consolidation across regulated sectors)

Recommendation: A USI-based national dashboard consolidating recurring workplace training (e.g., CPR annually; first aid triennially), sector clearances and equipment-specific competencies. Standardise once; allow sectoral add-ons.

• *Example:* An electrical technician may work at a casino (AML training), a mine site (site-specific inductions and medicals), a port or airport (security clearances), all while maintaining calibrated instruments (e.g., National Measurement Institute requirements). Lay every tool on the carpark asphalt and each item carries its own legal and maintenance obligations.

• *Pain points:* duplication (repeating similar inductions across competing companies), mobile-unfriendly induction modules.

• *Proposed approach:* a whole-of-economy stocktake of WHS and learning modules to remove duplication. PGPA regulatory entities could lead cognitive walkthroughs of safety scenarios and publish plain-language guidance that states/territories can adopt. Mutual recognition should be the default across employers and sites.

3) Harnessing Data & Digital Technology

Outcomes-Based Privacy (Draft Rec 3.1)

Recommendation: Amend the Privacy Act to add an outcomes-based compliance pathway that replaces box-ticking with verifiable privacy results. Use CRMP-aligned AI checklists to generate baseline PIAs instantly.

QR Codes — a simple governance test

As the Commonwealth Government COVID-19 Response Inquiry Report⁴ found, QR codes were rapidly deployed during the pandemic, and raised privacy, trust, and consistency issues.

Guidance on technology should remain neutral and adaptable. The current widespread use of QR codes by governments and businesses across Australia highlights offers an opportunity for clarity on the use of data

⁴ <https://www.pmc.gov.au/sites/default/files/resource/download/covid-19-response-inquiry-report.pdf>

technologies. Without it, agencies and organisations risk inconsistent practices, privacy gaps, and diminished public trust.

PGPA entities audit public QR codes (e.g., payments, publications, posters, newspapers). They brief Accountable Authorities via a structured process around standard impact-analysis questions: status quo (do nothing) vs updated guidance for PGPA entities and the payments industry.

Gaps to surface: potential third-party routing without disclosure; missing PIAs; inaccessible/unstable landing pages; tracking/retargeting; absent versioning/dates; weak archival.

Lessons: briefing craft; use of primary sources (OAIC guidance, ISM, CRMP, Digital Service Standard 2.0); AI cross-checks of legal duties; balancing stewardship with pragmatism.

Streamlining Workforce Training across regulated industries

PGPA entities coordinate a national stocktake with regulators and industry to create core induction modules across multiple industries. A USI-linked dashboard surfaces expiries and pushes renewals to workers and employers. *Example:* a truck driver delivering to postal facilities, wharves and critical-infrastructure sites in the same week may be required to complete multiple common modules with duplicated content.

5) Embedding Culture, History & Civic Engagement

Case study — Productivity through accessibility

Educators such as Reverend William Moss embedded the idea that education must be practical, civic-minded and accessible. That culture of access meant a blind school student, Tilly Aston, could attend the 1888 Melbourne Centennial Exhibition at the Royal Exhibition Building, make lifelong friends, and be inspired by tactile art exhibits, music performances and public optimism during rapid technological change.

Aston later founded organisations for the blind, expanded braille access, and corresponded with Helen Keller — turning accessibility into productivity. **Lesson for 2025:** build access into the Australian Curriculum (long-term design; risk management; maintenance and review) and you build Australia's productive capacity.

Conclusion

Australia's productivity depends on more than capital and labour — it depends on trust, stewardship, and the capacity to learn together. Accessibility, transparency, and explainability are not “add-ons”; they are the foundations of legitimacy in a data-driven economy.

If PGPA entities model good practice — publishing machine-readable data, indexing QR codes, embedding the Australian National Dictionary, and explaining technologies in plain language — states, territories and councils will follow. This is how stewardship moves from principle to everyday practice.

Modern AI tools make this achievable. They can generate baseline risk assessments in seconds, leaving public servants more time for genuine consultation and human connection. That balance — technology doing the heavy lifting, people doing the listening — is what will sustain trust.

Bob Hawke's call for a “clever country” remains unfinished business. Embedding digital literacy, cultural resources, and transparent governance across the five pillars is the practical path to get there. If we seize it, Australia can be both more productive and more democratic — a nation where citizens not only work with new technologies, but understand them, question them, and trust the institutions that deploy them.

I used AI tools to help draft and structure this submission, demonstrating how they can reduce workload and free up time for consultation and engagement — the same principle I recommend throughout.