



THE LAW SOCIETY
OF NEW SOUTH WALES

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8 March 2019

Mr Jonathan Smithers
Chief Executive Officer
Law Council of Australia
DX 5719 Canberra

By email: natasha.molt@lawcouncil.asn.au

Dear Mr Smithers,

Artificial Intelligence: governance and leadership

Thank you for the opportunity to contribute to a submission on the Australian Human Rights Commission (“AHRC”) and the World Economic Forum (“WEF”) white paper, *Artificial Intelligence: governance and leadership*. The Law Society’s Privacy and Data Law Committee has contributed to this letter.

This letter supplements our earlier letter dated 14 September 2018, which commented on the impact of new technologies on human rights and the principles that should be applied for the protection of human rights amidst the increasing adoption of artificial intelligence (“AI”) and related technology. A copy of this letter is attached.

Does Australia need a Responsible Innovation Organisation?

The central question posed by the white paper is whether Australia needs an organisation to take a central role in promoting responsible innovation in AI and related technology.

The Law Society agrees with the white paper’s hypothesis that “Australia needs to match the rising levels of innovation in AI technologies with innovation in AI governance.”¹

Technological developments are advancing at an exponential rate that outpaces the ability of our current legal and regulatory frameworks to keep up. The danger of this uneven development, as the *Human Rights and Technology Issues Paper*² identifies, is that it entails the risk of undermining fundamental human rights (e.g. the right to

¹ Australian Human Rights Commission and World Economic Forum, *Artificial Intelligence: governance and leadership white paper*, 2019, p. 8
<https://tech.humanrights.gov.au/sites/default/files/2019-02/AHRC_WEF_AI_WhitePaper2019.pdf>

² Australian Human Rights Commission, *Human Rights and Technology Issues Paper*, 2019
<<https://tech.humanrights.gov.au/sites/default/files/2018-07/Human%20Rights%20and%20Technology%20Issues%20Paper%20FINAL.pdf>>

privacy, the right to a fair trial, the right to non-discrimination and equal treatment and personal safety and security). It also has the potential to disrupt labour markets by replacing human workers with automation and displace those workers unable to upskill to adapt to the new market conditions. A further risk is the increase in social inequality because of unequal access to new technologies and knowledge systems that perpetuate social exclusion.

Of course, many of these challenges already exist. They manifest most particularly in the form of automated algorithmic-driven decision-making by government agencies and businesses. This operates in ways that may substantially and adversely affect the treatment of individuals, from rapid deployment of “internet of things” devices and services, and through pervasive surveillance of behaviour of individuals both offline and online through use of so-called “perception AI”.

AI adds to the catalogue of issues arising from “big data” and rapid and unpredictable technological innovation. There are some new issues that are particular to advanced AI. They include the risk of opaqueness or explainability as to how machine learning enabled decisions are made and a new challenge of allocating legal responsibility for autonomous devices and liability when autonomous agents are unregulated and cause harm. But most of the current challenges are highly application-specific and context-specific: they arise from deployment of algorithmic decision-making and pervasive data collection in specific contexts where risks of harms or unintended consequences are particularly high.

Context-specific risks require careful consideration of possible harms in particular sectors, applications and deployment environments (e.g. homes, offices, workplaces, etc.). There is a real risk that creation and designation of a responsible AI organisation will create a false sense of security of citizens and consumers. It may create a perception that “here and now” issues of context-specific risks and harms should and can be addressed by AI experts in a responsible innovation organisation.

Instead, government agencies, businesses, universities, regulators and civil society must be enabled to develop awareness and the capability to recognise, address, manage and mitigate risks and harms arising through data driven decision-making and technological innovation, including advances in AI. We should not defer consideration of “here and now” issues or reallocate current responsibilities to address these issues, where evolution and adaptation of existing regulatory bodies, co-regulatory schemes and self-regulatory frameworks may (reliably and verifiably) mitigate risk and harm.

In summary, there is a real risk that looking at AI as a new legal paradigm, or as a fundamentally different governance challenge, enables deferral of accountability and responsibility. We should be cautious in responding to calls to “do something about AI” as though AI is an existential threat or fundamentally different innovation, rather than a new challenge for how we regulate our society to harness benefits and manage risk of technological innovation.

This note of caution should not be interpreted as suggesting that regulation must require significant adaptation. A challenge for governance of AI is how to safeguard fundamental rights and dignities, while also supporting technological development, innovation and expansion and balance the interests of various stakeholders whose interests often will not align. The WEF has noted that linear, top-down and centralised approaches to governance that were appropriate for the conditions of earlier industrial revolutions are unlikely to be applicable to the conditions of the Fourth Industrial

Revolution.³ The question is what is the most effective new form of governance? This also raises the question of how to stimulate development and application of bottom-up and context specific controls and safeguards against the risks and harms of deployment of AI.

The idea of a Responsible Innovation Organisation (“RIO”) offers a useful starting point. The white paper suggests that “Such an organisation could combine capacity building, expert advice, governance, leading practices and innovative interventions that foster the benefits of AI while mitigating risks”.⁴ The RIO may allow industry to continue to develop without excessive regulatory burden, while also encompassing supervision and oversight of technological developments in ways that are oriented to the protection of individual and collective rights and freedoms. The Law Society stresses that any RIO should be independent, transparent and accountable in order to maintain the confidence of stakeholders.

We affirm our support for the appropriation of the human rights framework to guide the development and governance of innovations in AI technologies and therefore to guide the operation of the RIO. The Law Society considers that, with the expansion in the use of AI, it is critical that innovation be carried out in a way that is responsible, transparent and have regard to fundamental human rights.

As laws protecting privacy have not kept pace with technological developments, consideration of the privacy aspects of AI and the protection of privacy is necessary. It is particularly important that privacy is safeguarded when using AI with sensitive information in areas like criminal justice, healthcare and in terms of facial recognition technology. Without sufficient attention to privacy concerns in the design of new technologies, there is a risk that it may not be possible to later legislate to correct harmful encroachments or redress the ensuing injustices. Any RIO should, therefore, work closely with the Office of the Australian Information Privacy Commissioner (“OAIC”).

RIO Functions

We suggest that a key role of the RIO should be translational: to anticipate and articulate issues in a way that empowers civil society and regulators to engage with issues that arise from data driven decision-making and technological innovation. It should detect gaps in regulation and the current mandate of existing regulatory bodies and suggest how those gaps might be filled. Further, the RIO should identify where current regulation, expectations as to good practice, or regulatory sanctions are not fit for purpose.

The Law Society proposes the below as functions for the RIO:

Regulating the development of AI algorithms

Consistent with the principle of privacy-by-design, the RIO should have a role in determining the appropriate scope for regulation of algorithmic decision-making and applications of autonomous AI. As noted in our earlier letter, if AI algorithms are informed by biased or discriminatory attitudes, then “discrimination will be replicated,

³ Klaus Schwab, World Economic Forum, “The Fourth Industrial Revolution: what it means, how to respond”, 2016 <<https://www.weforum.org/agenda/2016/01/the-fourth-industrial-revolution-what-it-means-and-how-to-respond>>

⁴ Australian Human Rights Commission and World Economic Forum, *Artificial Intelligence: governance and leadership white paper*, p. 8.

perpetuated and potentially even reinforced”⁵. This can have significant consequences for individuals belonging to particular groups.

For instance, some information that AI is designed to collect about an individual may be classified as “sensitive information”⁶, which is defined by s 6 of the *Privacy Act 1998* (Cth), as follows:

- (a) information or an opinion about an individual’s:
 - (i) racial or ethnic origin; or
 - (ii) political opinions; or
 - (iii) membership of a political association; or
 - (iv) religious beliefs or affiliations; or
 - (v) philosophical beliefs; or
 - (vi) membership of a professional or trade association; or
 - (vii) membership of a trade union; or
 - (viii) sexual orientation or practices; or
 - (ix) criminal record;that is also personal information; or
- (b) health information about an individual; or
- (c) genetic information about an individual that is not otherwise health information; or
- (d) biometric information that is to be used for the purpose of automated biometric verification or biometric identification; or
- (e) biometric templates.

These categories of sensitive information can lend themselves to biased or adversely discriminatory behaviours and decisions. As a reference point for what type of information may lend itself to algorithmic bias, the RIO might consider adopting the above definition of “sensitive information”. The risk is that if biased or discriminatory attitudes are built into AI this can perpetuate bias in decision-making and potentially infringe procedural fairness or even the right to a fair hearing.

This is not to suggest that data sets containing sensitive information (for example in relation to health) should not be used in AI decision making. In the health sector for instance, there are examples of where AI, in the form of health apps, can make a beneficial difference to an individual’s management of a health condition. Rather, our suggestion is that the RIO have a role in assessing that the appropriate balance is struck between the benefits and harms of AI.

Regulation of the development of AI algorithms and requirements for their transparency can mitigate against the harmful risks. Visibility into the data used in decision-making to prevent skewed data input and therefore the generation of biased data sets would be an essential feature of risk management. Personal Impact Assessments may also be a means by which the privacy impacts of AI can be assessed so that strategies for the mitigation of risks can be developed to ensure that privacy is protected before information is collected and used.

⁵ European Union Agency for Fundamental Rights, *#BigData: Discrimination in data-supported decision-making* (FRA Focus, 2018), p. 10 <<https://fra.europa.eu/en/publication/2018/big-data-discrimination>>

⁶ The definition of sensitive information differs across jurisdictions however the Commonwealth definition is covered by s 6 *Privacy Act 1998* (Cth).

Additionally, the Law Society suggests that issues of data protection, collection and retention of data used in AI systems need to be examined by the RIO when AI is being developed. Safeguards such as data minimisation, purpose limitation and express consent ought to be implemented and enforced by the RIO or any AI regulatory body, to prevent unauthorised collection and abuse of data.

Establishing effective monitoring and accountability measures of AI

In addition to reviewing the design of AI algorithms, the Law Society considers that the RIO should have the ability to require organisations to make descriptions of functionality of algorithms used by those organisations available to individuals for scrutiny where concerns about infringements of their rights arise. While we acknowledge that there may be arguments against this from the perspective of protecting intellectual property interests or commercial interests, these considerations are to be weighed against freedom of information considerations, transparency and principles of democratic governance. The RIO may be invested with the power to undertake this balancing exercise. Algorithms may be explained without compromising any trade secret character of the underlying algorithm itself. Commercial interest should not be a reason to deny an individual access to an appropriate and reasonable explanation of how algorithms have been used to affect how an organisation (both Government agencies and private sector organisations) deals with that individual as compared to other individuals.

Individuals should be able to seek access to this information and the RIO should be invested with the requisite functions and powers of assessing and administering the request. Individuals should have the right to seek review of the RIO's decisions. Further, following principles of privacy law, they should have the ability to withdraw their consent for their data to be used in AI decision-making.

Empowerment of civil society through education and capacity building

The RIO should have a key function of empowering civil society through education and capacity building in the development and deployment of data-driven decision-making and technological innovation.

First, attention ought to be given to educating individuals and particularly to members of vulnerable groups such as children, older people and Aboriginal and Torres Strait Islander communities.⁷ This agenda could incorporate improving their digital ability as well as addressing the affordability and accessibility of digital tools. Second, it is recommended that the RIO have a role in educating AI developers to cultivate their awareness of and compliance with responsible innovation. Third, the RIO's functions could include developing guidance and setting standards on the proper use of data in AI decision-making, including guidance on the ethical use of data. These educational functions would assist to protect individuals as data subjects and create general confidence in AI.

RIO Powers

The Law Society considers that enforcement and compliance activity is a necessary component of a governance and regulatory framework for AI. This could include powers to investigate how algorithms have been used to affect how an organisation,

⁷ See Law Council of Australia "Human Rights and Technology" submission, 25 October 2018
<<https://www.lawcouncil.asn.au/resources/submissions/human-rights-and-technology>>

powers to investigate how algorithms have been used to affect how an organisation, whether government or private sector, deals with individuals, and ensure that uses are reasonable, properly explained and tested, and relevant data appropriately protected. The power to impose penalties for non-compliance with an enforceable regulatory code, such as fines or bans on AI processing, may also be considered. Whether the RIO itself is conferred with and exercises such powers, or another regulatory body such as OAIC or the Australian Competition and Consumer Commission ("ACCC"), is a matter for consideration as to good regulatory design and appropriate resourcing.

We reiterate our earlier comment that the RIO should work closely with the OAIC in relation to the privacy implications of AI governance and regulation. Similarly, consideration should be given to how the RIO will interact with other agencies such as the ACCC, the Australian Securities and Investments Commission and the Australian Competition and Media Authority. While there are advantages to the establishment of an independent body mandated to regulate AI in a harmonised approach across sectors and jurisdictions, it is critical that overlaps between regulatory bodies are avoided, particularly regarding enforcement and compliance.

Should you have any questions in relation to this submission, please contact Ida Nursoo, Policy Lawyer, on 9926 0275 or email ida.nursoo@lawsociety.com.au

Yours sincerely,



Elizabeth Espinsosa,
President



THE LAW SOCIETY
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Our ref: HRC/DHas: 1581980

14 September 2018

Mr Jonathan Smithers
Chief Executive Officer
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By email: nathan.macdonald@lawcouncil.asn.au

Dear Mr Smithers,

Consultation on Human Rights and Technology

Thank you for the opportunity to provide input to a potential Law Council of Australia submission to the Australian Human Rights Commission ("AHRC") consultation on human rights and technology.

This submission is informed by our Human Rights Committee and our Privacy and Data Law Committee.

The human rights impact of new technologies: our focus in this submission

New technologies¹ such as Artificial Intelligence ("AI"), robotics, the Internet of Things, and virtual reality have the potential to both promote and imperil human rights. The Issues Paper on Human Rights and Technology ("Issues Paper") published by the AHRC in July 2018 identifies a suite of human rights that new technologies might affect, from the right to education, to the right to a fair trial, to the right to benefit from scientific progress. In this submission, the Law Society focuses primarily on the implications that new technologies hold for the right to privacy, the right to equality and non-discrimination, and the right to accessibility.

New technologies and marginalised groups in Australia

The Issues Paper published by the AHRC observes that "specific groups will feel both the positive and negative impacts of new technologies differently to other Australians".² At the level of access, this trend can be seen in the digital divide affecting many groups across Australia. The 2017 Australian Digital Inclusion Index found that several groups are particularly digitally excluded: people in low income households, people aged 65 and over, people with a disability, people who did not complete secondary school, Indigenous

¹ In this submission, the Law Society of NSW uses the term "new technologies" as shorthand for the 12 types of technology highlighted at page 18 of the Issues Paper published by the AHRC, namely: new computing technologies; blockchain and distributed ledger technologies; the Internet of Things; AI and robotics; advanced materials; additive manufacturing and multidimensional printing; biotechnologies; neurotechnologies; virtual reality and augmented reality; energy capture, storage and transmission; geoeengineering; and space technologies.

² Australian Human Rights Commission, *Human Rights and Technology Issues Paper* (2018) 20.

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Australians, and people not in paid employment. Women in Australia are also less likely to be online than men, particularly those in the 65 and over age group.³

With an increasing number of jobs, social services and communications tools requiring internet connectivity and digital literacy, there is a real risk that this digital divide will contribute to already-marginalised groups missing out on new opportunities. To address this trend, policymakers, businesses, and the education sector should place a focus on improving the digital ability of people in marginalised groups, as well as addressing the affordability and accessibility of digital tools.

How should Australian law protect human rights in the context of AI informed decision-making

In an article published in *Science* in August 2018, Mariarosaria Taddeo and Luciano Floridi of the University of Oxford described AI as “a powerful force that is reshaping daily practices, personal and professional interactions, and environments”.⁴ As AI systems become more tightly woven into everyday life – from the household to the government level – the risk of AI informed decision-making having a negative impact on human rights grows. The Law Society notes that the continued rise of AI across many systems in everyday life has the potential to effectively institutionalise discrimination, diminishing accountability in relation to the making of AI informed decisions. As the Issues Paper notes, instances of unjust consequences arising from AI informed decision-making have already occurred internationally in areas including recruitment, performance management and issuance of bail.⁵ Unless guidelines and regulation are introduced to ensure fairness, transparency and accountability of algorithmic decision-making, the complexity, intricacy and inscrutability of these systems could compound disadvantage for some sectors of the community.

We note that the EU Fundamental Rights Agency stated in a 2018 report that if AI informed decision-making models are informed by biased data or algorithms, “discrimination will be replicated, perpetuated and potentially even reinforced”.⁶ We also note that in a report published in April 2018, the UK House of Lords Select Committee on Artificial Intelligence stated that “the prejudices of the past must not be unwittingly built into automated systems, and such systems must be carefully designed from the beginning.”⁷

The Law Society submits that fairness, transparency, non-discrimination and accountability should be the central focus of regulation in the area of AI so as to prevent inequality from becoming further entrenched within social, governmental and economic systems. The Law Society supports the establishment of appropriately regulated AI-informed decision-making processes which will allow for the benefits of AI to be provided to society while protecting fundamental rights, including the rights to privacy⁸ and non-discrimination.⁹

The Law Society agrees with the position in the Issues Paper that robust and transparent procedures and guidelines are necessary regulatory steps to maximise the benefits and minimise the risks of AI in Australia. In particular, we note the importance of increased

³ Julian Thomas et al, *Measuring Australia's Digital Divide: The Australian Digital Inclusion Index 2017* (RMIT University, 2017) 5.

⁴ Mariarosaria Taddeo and Luciano Floridi, ‘How AI can be a force for good’ (2018) 361(6404) *Science* 751.

⁵ Australian Human Rights Commission, above n 2, 30.

⁶ European Union Agency for Fundamental Rights, *#BigData: Discrimination in data-supported decision-making* (FRA Focus, 2018) 10.

⁷ House of Lords of the United Kingdom Select Committee on Artificial Intelligence, *AI in the UK: ready, willing and able?* (House of Lords, 2018) 5.

⁸ *International Covenant on Civil and Political Rights*, opened for signature 16 December 1966, 999 UNTS 171 (entered into force 23 March 1976) art 17.

⁹ *Ibid*, art 24.

transparency as a guiding principle, which will work to equip the public with necessary information to prevent harm, as well as empower individuals to better comprehend, assess and query decisions made by AI systems. In this regard, the Law Society is of the view that members of the public should be aware of how and when AI systems are being used to make decisions about them, and the implications this will have.

The principles that should be applied to protect human rights in respect of new technologies

The Law Society considers that the best approach to the development of legislation in this area is for laws to be principles-based, which will allow for flexibility and adaptability. As noted above, the principles that we believe should guide legislation in this area are: fairness, transparency, non-discrimination, and accountability. In practice, these principles would require that, for example:

- *Fairness.* Organisations must only collect data on a person for a legitimate purpose, and consider reasonable community expectations relating to the collection of this data.
- *Transparency.* An organisation must act with transparency when collecting, using and disclosing personal information, and disclose any use of data in an intelligible format. This should include the opportunity for individuals to correct records and to withdraw information. Furthermore, when AI informed decision-making has the potential to impinge on human rights, the source code that is the basis of these decisions should be open for public scrutiny.
- *Non-discrimination.* All algorithms that are used to make decisions about individuals must be evaluated for discriminatory effects, preferably prior to roll-out and on a periodic basis.
- *Accountability.* There must always be a line of responsibility for business and government actions to establish who is accountable for consequences arising from the use of new technologies.

Gaps in existing Australian legislation regulating the use of AI and related technologies

The Law Society submits that the current legal framework for AI is inadequate and insufficient to protect human rights, and we consider recent issues relating to the adoption of AI around the globe highlight the potential for the utilisation of AI to create a complex web of legal, ethical and societal problems.

The Law Society supports the introduction of robust legal and regulatory guidelines to:

- regulate how AI algorithms are developed;
- regulate the areas where AI can be utilised in conjunction or in substitution for human expertise and labour; and
- establish effective monitoring and accountability measures to better identify, control and respond to AI issues.

The Law Society considers that the significant pace of change in this area will create challenges for the appropriate, timely and adequate development of robust measures, however we submit that it is essential for such measures to be developed noting the major changes that new technologies such as AI will have on the legal and economic landscape.

Protecting the right to privacy in an era of new technology

The Law Society is of the view that laws protecting individuals against breach of privacy have not kept pace with technological developments, and should be reviewed and reformed. New technologies, such as those that enable corporations and governments to build up detailed profiles of individuals based on their personal data and browsing history, present an unprecedented scope for serious invasions of privacy. The right to privacy is recognised as a fundamental human right in the *Universal Declaration of Human Rights*, the *International Covenant on Civil and Political Rights* ("ICCPR"), the *Convention on the Rights of the Child* ("CRC") and other instruments and treaties.

Article 17 of the ICCPR states:

1. No one shall be subjected to arbitrary or unlawful interference with his privacy, family, home or correspondence, nor to unlawful attacks on his honour and reputation.
2. Everyone has the right to the protection of the law against such interference or attacks.¹⁰

Article 16 of the CRC is in similar terms in relation to children.

Australia's obligations under the ICCPR and CRC – which Australia ratified in 1980 and 1990 respectively – require enhanced protections against breach of privacy, to protect against incursions of privacy enabled by new technologies. The 2014 Australian Law Reform Commission ("ALRC") inquiry into Serious Invasions of Privacy in the Digital Era at Recommendation 5-1 and 5-2 outlined how the current gap in privacy legislation could be addressed. The Law Society continues to support the recommendation of the ALRC that a new Commonwealth Act enact a statutory cause of action for serious invasion of privacy.¹¹ In particular, the Law Society endorses the ALRC's recommendation that the new tort should cover two types of invasion of privacy: intrusion upon seclusion; and misuse of private information.¹²

As the ALRC recommended in 2014, the design of legal privacy protection should be "sufficiently flexible to adapt to rapidly changing technologies and capabilities, without needing constant amendments".¹³ This recommendation is particularly salient in light of the exponential pace at which new technologies such as AI and blockchain are developing, and the evolving scope of their application.

Regulating new technologies: lessons to learn from international human rights law and other countries

States and regional bodies across the world are grappling with similar problems of how to apply existing legislation to new technologies, and how to develop new regulations to address the gaps that emerge. In the European Union, Article 22 of the General Data Protection Regulation ("GDPR") contains rules to protect individuals in the context of automated decision-making with a legal or otherwise significant effect on them. The Law

¹⁰ *International Covenant on Civil and Political Rights*, above n 8, art 17.

¹¹ See:

<https://www.parliament.nsw.gov.au/lcdocs/submissions/51194/0015%20The%20Law%20Society%20of%20New%20South%20Wales%20.pdf>

¹² Australian Law Reform Commission, *Serious Invasions of Privacy in the Digital Era*, ALRC Report 123 (2014), 9.

¹³ Australian Law Reform Commission, *Serious Invasions of Privacy in the Digital Era*, ALRC Report 123 (2014), 36.

Society is of the view that provisions in the GDPR protecting individual rights in the face of AI-informed decision making, as well as regulating the type of data that can be used, are a benchmark for how these issues should be approached.

The Law Society encourages the AHRC, along with government at the state and federal level in Australia, to continue to learn from international best practice in the regulation of new technologies. We therefore support the ongoing partnership between the AHRC and the World Economic Forum, and await the White Paper that will result in early 2019.

The role and responsibilities of technology companies in respecting human rights

In addition to the role of government in regulating new technologies, companies that are creating and operating new technologies have their own responsibility to respect human rights. These responsibilities are articulated by the UN Guiding Principles for Business and Human Rights ("UNGPs"), which were endorsed by the UN Human Rights Council in 2011. Under the UNGPs companies are expected to respect human rights and avoid causing adverse human rights impacts through their activities. The UNGPs recommend that companies ensure compliance with this responsibility to respect human rights through:

- expressing their commitment through a statement of policy;
- implementing effective human rights due diligence to identify, prevent and address actual or potential human rights impacts;
- mainstreaming human rights consideration across business operations and activities based on that due diligence; and
- enabling access to effective grievance mechanisms by affected groups and individuals.¹⁴

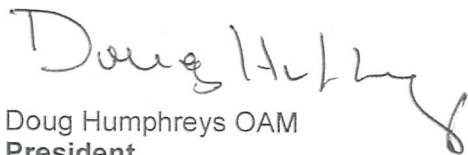
To maximise the potential benefits that new technologies hold for human rights, while minimising the risks, the Law Society recommends that technology companies operating in Australia follow the UNGP steps outlined above. To spur action within the private sector, we recommend that the Commonwealth Government develop guidance for businesses on conducting effective human rights due diligence in accordance with the UNGPs. The Law Society also recommends that the Government continue reform of the National Contact Point for the OECD Guidelines on Multinational Enterprises to ensure additional resources for joint fact-finding, improved mediation services and determination of grievances where relevant.

In recognition of the important role that companies have to play in this area, we recommend that the AHRC build a focus on the human rights responsibilities of companies as it implements its project on human rights and technology. We also encourage the AHRC to consult with experts on business and human rights, both within Australia and internationally, to inform their consideration of these important issues.

¹⁴ *United Nations, Guiding Principles on Business and Human Rights: Implementing the United Nations "Protect, Respect and Remedy" Framework* (2011) HR/PUB/11/04

Thank you for the opportunity to provide input on this topic. Should you have any questions or require further information please contact Andrew Small, Policy Lawyer, on (02) 9926 0252 or email andrew.small@lawsociety.com.au.

Yours sincerely,

A handwritten signature in black ink that reads "Doug Humphreys". The signature is written in a cursive style with a large, stylized 'D' and 'H'.

Doug Humphreys OAM
President