



29 September 2022

Productivity Commission
Level 8, Two Melbourne Quarter
697 Collins Street
Docklands Vic 3008
Email: productivity.inquiry@pc.gov.au

Re: Productivity Commission Interim report: Australia's data and digital dividend

Salesforce is pleased to provide this submission to the Productivity Commission Interim report.

About Salesforce

Salesforce is the #1 CRM, and an enterprise software company. Salesforce is a cloud computing company covering customer relationship management and other business-focused software to businesses, governments, and other organisations around the world. Salesforce is used by over 150,000 customers globally. In 1999, Salesforce pioneered the 1-1-1 Model which dedicates 1% of Salesforce's equity, 1% of Salesforce's product, and 1% of Salesforce employees' time back to communities around the world.

Among the Salesforce acquired companies is Tableau. Tableau is a visual analytics platform that transforms the way we use data to solve problems, empowering people and organisations to make the most of their data.

Our comments and recommendations are appended below.

Build an Inclusive Data Culture

The report highlights the imperative for building consumer data portability, which can be developed through a culture of secure data sharing. At Tableau, data culture is defined as the collective behaviours and beliefs of people who value, practice, and encourage the use of data to improve decision-making. As a result, data is woven into the operations, mindset, and identity of an organisation. There are readily available tools in the market that provide secure, open-source data sharing like [Tableau's Delta Sharing solution](#) and [Tableau's Do No Harm Guide](#). When data is easily accessible and shared, stakeholders across the industry will be equipped with the insights they need to be truly data-driven.



- **Recommendation #1:** Invest in both data culture and technologies to help organisations make data-driven decisions.
- **Recommendation #2:** Encourage the industry to share data within their ecosystem, even as the Consumer Data Right is extended to other sectors.

Government-Industry Partnerships

The report recommends the development of digital and data skills to enhance productivity as demand for these workers grow. Data literacy is vital to enable organisations and businesses to adapt and respond to the rapidly changing environment. In a 2022 [research study](#) commissioned by Tableau, organisations that invest in data literacy and upskilling see significant improvements in productivity and decision-making.

Salesforce believes that every Australian should have opportunities to level up their knowledge with transferable and useful skills to gain jobs in the digital economy. Salesforce's Trailhead is a free, online learning platform that empowers anyone, no matter their education level, socio-economic status, and background, to skill up for the future and learn in-demand skills that lead to top jobs. Salesforce partners with many technology vendors to deliver additional skills-based content. Through Trailhead Academy, Salesforce provides expert-led in-person learning and the opportunity to earn internationally recognised certifications for Salesforce skills. With Trailhead, one in four learners find a new job.

Salesforce partnered with the Australian technology sector to launch [Skill Finder](#), a world-first, totally free micro-skills marketplace available to all Australians. Its mission is to provide accessible and practical short courses that help people get hired, advance their career or build their business.

- **Recommendation #3:** Extend and expand Skill Finder 2.0 which provides further information on linking completed training to jobs.

Artificial Intelligence

The report articulated the need to adopt a proactive approach in maintaining trust in AI technology adoption without compromising innovation. With a strong commitment to the application of AI ethics, Salesforce developed the Office of Ethical and Humane Use in 2018, to embed ethics organisation-wide, across company policies, products, and features, and ensuring accessibility and inclusive design in the product development process.

Salesforce launched the AI Ethics Model in 2021, which subsequently led to the creation of [Trusted AI Principles](#), Salesforce is committed to developing AI that is responsible, accountable, transparent, empowering, and inclusive.



At Salesforce, we are of the view that AI systems should: treat all people fairly; empower and engage people; perform reliably and safely; be understandable; and be secure and respect privacy. Salesforce upholds this important set of universal principles for AI systems through Salesforce Einstein, which integrates AI technologies into Salesforce's CRM. Einstein democratizes the power of AI for every Salesforce user, delivering smarter, more personalised and predictive customer experiences by automatically discovering relevant insights, predicting future behavior, proactively recommending best next actions and even automating tasks. Salesforce has delivered more than 80 billion AI-driven predictions to its customers every day.

Salesforce is additionally committed to help its tech partners and users implement these AI principles in practice. The AI [Ethics Maturity Model](#) is one of Salesforce's initiatives to help organisations address ethical issues during AI development and implementation phase. Salesforce further provides education and training through its Responsible Creation of AI for Salesforce users to bring awareness on the biases of AI and explore the developments of ethical AI. Salesforce submits the following recommendations for the Productivity Commission Australia to support the ethical adoption of new uses of technology:

- **Recommendation #4:** Consider the establishment of an expert Advisory Council, to help in providing strategic advice in relation to AI. For instance, the NSW Artificial Intelligence (AI) Advisory Committee comprises of experts to use their extensive and varied experience to provide ongoing strategic advice on the use of AI to assist in decision-making and improving service delivery across the NSW Government. Another example is Singapore's Advisory Council on the Ethical Use of AI and Data to advise the Singapore Government on ethical, policy and governance issues arising from the use of data-driven technologies in the private sector and providing general guidance to businesses to minimise risks, and to mitigate the adverse impact on consumers from harm, and which Salesforce is a member of.
- **Recommendation #5:** Adopt a risk-based approach to regulating AI. Businesses need access to digital services and technologies, such as AI, to increase efficiencies and to unlock new capabilities to stay competitive. Many types of digital platforms and services exist for different purposes and functions, and each of these platforms and services may use AI technologies for vastly different purposes and functions.
- **Recommendation #6:** Align new AI initiatives and policies with international best practices. The existing international privacy frameworks such as the OECD Privacy Framework and the EU's General Data Protection Regulation, which incorporate guidelines on automated decision-making, provide a baseline set of requirements. Salesforce recommends that the government closely follow international best practices in the development of new initiatives and policies for AI, to encourage interoperability and certainty for businesses.
- **Recommendation #7:** Ensure the implementation of appropriate and clear guardrails around facial recognition technology. Although facial recognition technology can have important uses, such as when individuals voluntarily use it to unlock devices, such as our phones, subject to



meeting privacy and security requirements, it can also pose challenges. Salesforce has taken the position of not allowing the use of our products for facial recognition. We have done so by considering how we develop our AI technologies and the safeguards we develop for their responsible use. Facial recognition can be impaired when factors like ageing, camera viewpoint, distance, barriers, illumination, shadows, and movement are introduced.

- **Recommendation #8:** Consider the appointment of a Chief Ethical and Human Use Officer, whose role is to help with the implementation of the framework for the ethical and humane use of technology. From an ethics perspective, this role can help to shape policy development and ensure ethics by design, that involves incorporating safeguards in government services and steering the design towards maximum benefit.
- **Recommendation #9:** Carefully consider applying AI in government social programs, with the involvement of impacted individuals. AI has the potential to address the world's most challenging social problems. Some of the problems AI could help address are contained in 17 of the UN's Sustainable Development Goals, designed to be a blueprint to achieve a better and more sustainable future. This means using AI beyond automation and efficiency all sorts of challenges whether it be addressing poverty, disease, environmental and educational challenges. The government should carefully consider applying AI within existing social programs, in partnerships with the industry and impacted individuals to ensure that they are not excluded from these efforts.

Thank you for the opportunity to provide comment. Should you require further information, I can be reached

Yours sincerely,

Sassoon Grigorian
Vice President, APAC Government Affairs