working for stronger emergency communications

Department of Industry, Science and Resources

Safe and responsible AI in Australia

The National Emergency Communications Working Group – Australia and New Zealand (NECWG-A/NZ) is recognised and respected nationally and globally for its professional leadership and advisory functions that support Australia and New Zealand's emergency communications sectors.

The NECWG-A/NZ's purpose is to improve community safety outcomes through advocating, and/or influencing change for the Emergency Call Services (ECS) of Australia and New Zealand in a timely manner to support planning and the impacts of more immediate challenges.

The NECWG-A/NZ has working relationships with the Department of Infrastructure, Transport, Regional Development, Communications, and the Arts (DITRDCA), and the Australian Communications Media Authority (ACMA) in support of the operation and development of the ECS.

While the NECWG-A/NZ notes individual jurisdictions or agencies may respond directly and in relation to their specific considerations, this submission in response to the discussion paper for supporting responsible AI is primarily focussed on the general implications for the ECS (comprising the national Emergency Call Person (ECP) and the Emergency Service Organisations (ESOs)), the providers of services to the ECS, and the community as users of the ECS.

The NECWG-A/NZ is part of a global collaboration forum for emergency communications that includes Europe, United Kingdom, United States, South America, and Canada and which has been monitoring progress in both AI development and policy internationally.

ESOs have been using forms of AI for many years including automatic number plate recognition, and algorithms to identify medical criticality. However, with the rapid development of intelligent systems, the opportunities available to ESOs and the community to enhance emergency communications services, there is a need for active discussion on the access to and application of these technologies.

A key consideration for emergency communications is that AI is to be used for assistance purposes, **critical decision making should remain the domain of human officials**.

ESOs rely on verifiable facts to determine and coordinate the response to emergency situations. This focus is a critical factor when considering the introduction and use of AI systems in the emergency communications sector.

The volume of data available to ESOs and the speed with which new data and information becomes available makes it difficult for human officers to assess the information and discern verifiable facts in a timely manner, potentially creating delays in response decisions and negative outcomes.

In considering the policy / legislation associated with AI, it is important to note that in today's environment, technology has no borders and as such the NECWG-A/NZ considers that any legislation should encompass:

- Those that develop AI systems onshore,
- Those that develop AI systems offshore but are implemented onshore, and
- Those that develop AI systems offshore that onshore agencies access or use.

It is also important to acknowledge the transparency of use of AI systems in the provision and delivery of public safety services including the ECS.

While not wishing to impinge on service delivery or on people's rights to privacy and human rights, there are circumstances where AI systems may assist in law enforcement or other public safety agencies in matters such as:

- Searching for specific victims of crime including missing children (persons),
- Prevention of imminent threat to life or the physical safety of natural persons or of a terrorist attack, or
- Detection, localisation, identification or prosecution of a perpetrator or suspect of a criminal offence.

The NECWG-A/NZ acknowledges the classification of AI systems as has been proposed by the European Union, with a caveat that some AI systems considered unacceptable may be beneficial when dealing with imminent threat to life. However, it is acknowledged that this should be a rare exception and should also be subject to a framework for timely authorisation prior to use of the AI system in these circumstances.

Specifically in relation to emergency communications, the Triple Zero service continues to experience increasing demand exacerbated by an ageing population and less resilient society who seek advice and information to support their own decision making.

In 2023-23, the Triple Zero service received 10,934,123 (answered) calls of which 3,329,224 were identified by the ECP as 'false' calls and not forwarded to the ESOs. The remaining 7,604,899 calls were processed by the ESOs and responded to according to their situation and priority. This process involves some algorithm-based systems (e.g. medical determination) however many are reliant on the knowledge of the ESO call-taker and dispatcher.

This methodology will quickly become untenable as demand on Triple Zero continues to increase as the population ages, becomes more diverse both in language and geography, and is impacted by more significant public safety events.

The emergency communications sector is traditionally risk adverse however, there is a comparative discussion on technological improvements that could enhance the Australian communities access to emergency assistance. Therefore, rather than just focussing on the potential risks of AI, it is arguably equally or more important to focus on the opportunities that AI is expected to deliver.

The use of AI systems to assist in the management of demand on the Triple Zero service at both the initial contact point (ECP) and the response point (ESO) is expected to be beneficial in decision making and in presenting the most critical requests for assistance first.

Examples of AI systems that could assist are:

- Determination of potential heart-attack via voice analysis,
- Active listening for background noises such as gunshots,
- Intelligent detector systems that can identify fire situations before they get out of control.

Many of these systems would fall within the European Union classification of 'High Risk AI systems' as they are intended to evaluate and classify emergency calls by natural persons or to be used to dispatch, or to establish priority in the dispatching of emergency first response services.

The NECWG-A/NZ acknowledges the proposal to classify AI systems which will interact with other systems that hold personal information; however it is also acknowledged they could be important tools in ensuring the ECP and ESOs are able to quickly identify the most critical requests and action them against the verifiable facts available to the ESOs, leading to more positive outcomes in the community.

In response to the request for submissions to support responsible AI the NECWG-A/NZ considers that:

1. Legislation, including terminology and definitions of AI, should be coordinated across the world to ensure consistency regardless of where or how the AI systems are developed and used.
2. That specific identification and/or exemptions (as appropriate) of AI systems in the support of public safety responses including the emergency communications sector be included in the legislation.
3. That critical decision making by humans becomes a principle of the legislation.
4. That an appropriate local governance / authorising environment is established to manage the use of AI systems in exceptional circumstances where that usage may conflict with the agreed classifications.
5. Consideration be given to a staged implementation of legislation or a light touch approach to reduce the risk of inhibiting or slowing industry development and/or supply.
6. A pragmatic approach to the requirements of organisations subject to the legislation be applied to ensure that costs to end users are minimised but structure exists for developers to demonstrate compliance.

Thank you for the opportunity to respond to this discussion paper. The NECWG-A/NZ are happy to discuss our response more thoroughly if required.

Yours Sincerely

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01 August 2023