



Name: Screenrights

Submission date: 6/06/2025

Participant background

1. I am responding on behalf of:

a business

2. Which of the following best describes you? Please select all that apply.

The participant did not respond to this question.

1. Support safe data access and handling through an outcomes-based approach to privacy

1. What steps do you or your business/organisation take in order to meet your obligations under the Privacy Act?

The participant did not respond to this question.

2. What other impacts does the Privacy Act have on your business/organisation? For instance, has your business/organisation faced uncertainty or been prevented from taking certain actions?

The participant did not respond to this question.

3. If some of the procedural requirements under the Privacy Act (such as requirements relating to consent, disclosure and notification) were replaced with outcomes-based obligations, how would that affect your business/organisation?

The participant did not respond to this question.

4. How is the Privacy Act operating to balance consumer privacy consideration while supporting the benefits associated with data sharing? Is the balance right?

The participant did not respond to this question.

5. Are there any changes you would like to see to privacy legislation in Australia? Please provide details below.

The participant did not respond to this question.

2. Unlock the benefits of consumer data through effective access rights and controls

1. Which of the following best describes you?

The participant did not respond to this question.

2. Do you allow your customers or service users to access or share data that you hold about them?

The participant did not respond to this question.

3. What kinds of data can they access and share and how are they able to do this?

The participant did not respond to this question.

4. Why don't you allow this?

The participant did not respond to this question.

5. What are the main challenges and costs involved in enabling customers / service users to access or share the data that you hold about them?

The participant did not respond to this question.

6. How can consumers be enabled to access and share data about themselves? What role, if any, should government play?

The participant did not respond to this question.

7. If you were required to provide access to consumer data on request what impact would that have on your business?

The participant did not respond to this question.

8. Have you used any tools or services to access or share your data? What tool/service did you use? What for? Was it useful?

The participant did not respond to this question.

9. Have you encountered any difficulties trying to access or share data about yourself?

The participant did not respond to this question.

10. Are there any changes you would like to see about the way you access data?

The participant did not respond to this question.

3. Enhance reporting efficiency, transparency and accuracy through digital financial reporting

1. Do you prepare financial reports for lodgement with ASIC (you may be required to submit financial reports to ASIC if you are a public company or large proprietary company)?

The participant did not respond to this question.

2. Why do you choose not to submit digital financial reports? What changes are needed for you to adopt digital financial reporting?

The participant did not respond to this question.

3. Do you use information in financial reports? If so, how do you currently use that information? Would you use digital reports differently to the hard copy and PDF reports that are currently submitted, and if so, how?

The participant did not respond to this question.

4. Enable AI's productivity potential

1. How are you currently using AI? Please provide details of the context and uses.

Screenrights has been using AI for several years to automate matching of data sets which is a core function of our business. We use both proprietary third party systems and in-house developed machine learning systems both of which are trained on our data.

2. Do you think there are opportunities to make greater use of AI in your work or home environment? What do you see as the biggest upsides?

There are very significant opportunities to make greater use of AI for Screenrights' purposes. The success of our existing data matching algorithms is driving us to expand the use cases to more data sets with the goal of automating a substantial part of our production process.

Like many other organisations, we are also very keen to use generative AI technologies to expand the role of AI across the company, however, this is hampered by a lack of transparency over the licensing of data used in the training of models. Screenrights respects the intellectual property rights of creators and is concerned that these have been ignored in the rush to train these systems. We are aware of some models which use licensed data in training, and we are seeking to rely on those where possible.

3. What challenges do you face in accessing or using AI? How can these challenges be overcome?

The biggest challenges are the lack of transparency over licensing of training data for foundation models, and the lack of clarity about the use of our in-house information by generative AI services to train their models.

This is both a question of respect for rights, and a real practical concern for companies wishing to use these systems. Screenrights' members include filmmakers many of whom are very keen to use these technologies in production. However, they are limited in doing so, because the technology companies will not (and presumably can not) warrant the provenance of materials used in the creation of outputs. Without such a warranty, filmmakers are prevented from obtaining bonds which are necessary for sale of content in many markets including the largest market for English language content, the United States.

Respect for others' IP and privacy of data are both critical to ensure support for these technologies in future. Ignoring the rights of others is limiting their usability for organisations and individuals that seek to respect others rights. Ultimately, it could undermine the social licence of these technologies altogether.

The challenges can be overcome by requiring that the services respect copyright in their creation and provide transparency about materials used in training.

By contrast, the challenges will not be overcome by creating legal loopholes for technology companies to exploit further. This will only undermine the long term goal of ensuring and ongoing viable creative sector and a social licence for generative AI to the detriment of Australia.

4. Do you have any concerns about using AI? What are the reasons for your answer? What can be done to lower your level of your concerns?

Screenrights' concerns relate to the issues referred to above: the unlicensed use of third party content; the lack of transparency about content used in training; and the privacy of internal data used in context setting for generative AI.

These can be resolved by setting clear guardrails for AI that require generative AI service companies to licence content used for training; be transparent about the content

used (which is a precondition for licensing to occur) and to clearly set out how internal content is used when the AI systems are operated.

We are also concerned about the potential impact of generative AI on the creative sector workforce. Many screen practitioners are concerned the AI will undermine their creative input and eliminate important roles which will have the effect of reducing the the creative value of the Australian screen sector. Furthermore, as the roles most impacted are relatively junior, it could dramatically limit the ability for people early in the careers to enter the industry which ultimately will mean that there is no pipeline of people coming through to fill more senior creative roles.