Client Information Guide

Automated Decision-Making Transparency | What ionMy clients need to know

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What's changing?

From 10 December 2026, amendments to the Australian Privacy Act introduce new transparency requirements relating to automated decision-making (ADM). Organisations covered by the Australian Privacy Principles may need to include additional information in their privacy policies where computer programs make, or substantially and directly assist with, decisions that could significantly affect individuals.

These requirements are not limited to artificial intelligence (AI). Traditional rules-based software can also be relevant.

When do the requirements apply?

The requirements may apply when a computer program uses personal information about an individual to make a decision, or to perform an activity substantially and directly related to making that decision, and the decision could reasonably be expected to significantly affect that individual's rights or interests.

Where applicable, the privacy policy must describe the relevant kinds of personal information and kinds of decisions made solely by, or substantially and directly informed by, computer programs. Human involvement does not, by itself, rule out disclosure obligations.

Understanding the role of software

Recording information	Suggesting or supporting an action	Making a decision
Software stores records entered by staff, such as incident or feedback details.	Software may calculate ratings, send alerts or suggest a category for a person to review.	Software determines an outcome, or substantially and directly informs a decision that may significantly affect a person.

These are practical distinctions to help assess how a process works; they are not, on their own, a legal test. Organisations should consider the full workflow and the actual use of software outputs.

Many of ionMy's automated functions are deterministic, meaning they follow predefined rules configured by the organisation rather than independently making decisions about individuals. For example, notifications, reminders and escalations operate according to established settings and triggers, with staff remaining responsible for reviewing information and determining appropriate actions.

What does this mean for organisations using ionMy?

This initial guide covers ionMy and Frontline Assist. The examples below describe current functionality confirmed through ionMy's internal product review; they do not determine whether a particular client's end-to-end decision-making arrangements meet the legal criteria.

- Incident and feedback records: Staff enter and classify information. Incident severity is selected by a user; ionMy does not independently determine severity.

- Alerts: Organisations configure notification rules, templates and recipients. Recipients can be selected through position allocations, such as responsibility for a particular facility. Alerts notify people rather than deciding an outcome about the individual concerned.
- Action reminders and escalations: Preconfigured rules can change an overdue action's status, priority or assigned person and send a notification. These are workflow changes, not an independent determination about the individual recorded in the system.
- Risk ratings: Staff select likelihood and consequence; ionMy looks up the rating in the organisation's configured matrix. The rating may appear in alerts, Data Watch or reports, but does not itself set incident severity or determine care or service outcomes.
- Data Watch: The system can count records, including those relating to a particular person, and notify designated users when an organisation-defined threshold is met. Staff decide what action, if any, follows.
- Frontline Assist: The app supports frontline data capture and voice-to-text transcription, which users review and can amend before submitting. Subsequent midline processing can suggest a record category from entered information, but a human reviews and accepts or changes the suggestion. A related alert may be sent to ionMy for human follow-up.

The confirmed product descriptions do not identify independent, agentic decisions about individuals in these functions. However, clients must assess whether any configured outputs substantially and directly inform significant decisions within their own operations.

What should your organisation do?

- Review ionMy, Frontline Assist and other systems used across your organisation.
- Identify processes involving personal information and assess whether software makes or substantially and directly informs decisions that could significantly affect individuals.
- Consider how staff use notifications, risk ratings, thresholds and suggested categories in practice.
- Record any relevant kinds of decisions and personal information, and review your privacy policy.
- Seek privacy or legal advice where appropriate, and reassess when your processes or software functionality materially change.

How ionMy can assist

ionMy can provide general product functionality information to support your assessment. Each organisation remains responsible for evaluating its own configuration, operational use and privacy policy disclosure obligations.

Scope and further information

OAIC guidance: https://www.oaic.gov.au/privacy/australian-privacy-principles/australian-privacy-principles-guidelines/chapter-1-app-1-open-and-transparent-management-of-personal-information

This document provides general information only and does not constitute legal advice. Each organisation is responsible for assessing its own obligations.