Client Privacy Policy Toolkit

Automated Decision-Making Transparency | Client Assessment Checklist & Privacy Policy Wording Guide

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Part A — Assess your organisation's use of automated decision-making

Use this checklist to assess your actual decision-making arrangements, including ionMy, Frontline Assist and other software. A configured notification or human-reviewed suggestion does not automatically mean an ADM disclosure is required; nor does human involvement automatically exclude one.

Step 1 — Identify relevant software and outputs

- Have we reviewed automated processes in ionMy, Frontline Assist and our other systems?
- Do any systems make decisions about individuals, or provide outputs that substantially and directly inform a human decision?
- Have we considered configured alerts, risk ratings, Data Watch thresholds, action escalations and midline category suggestions?
- Have we considered both rules-based automation and AI-assisted processing?

Step 2 — Consider the impact of decisions

- Could a resulting decision significantly affect a person's rights or interests, including access to care, support, services or employment?
- Have we considered residents, clients, participants, employees and other individuals?
- What does a staff member actually do after receiving an alert, rating, threshold notification or suggested category?

Step 3 — Review the personal information used

- Does the software use personal information about the individual affected?
- What kinds of personal information are used and how do they contribute to the decision?

Step 4 — Determine disclosure requirements

- Have we identified arrangements meeting the applicable legal criteria?
- Have we documented decisions made solely by computer programs and those substantially and directly informed by programs?
- Have we reviewed our privacy policy and sought appropriate advice where needed?

Part B — Recording your assessment

Complete a separate assessment for each potentially relevant process. Consider the whole workflow, including the role of staff and downstream use of outputs.

Assessment question	Your organisation's response
Software / system	
Automated function and configuration	
Output (e.g., alert, score, suggested category)	
Kinds of personal information used	
What decision, if any, follows?	
Does the software make or substantially and directly inform it?	

Could it significantly affect rights or interests?	
Human review and reliance on output	
Disclosure required? Rationale	
Assessment owner, date and next review trigger	

Part C — Suggested privacy policy wording

Important: These examples are starting points only. Include a statement only where it accurately describes your organisation's actual processes. Option 1 is not a substitute for an ADM disclosure where one is required.

Option 1 — General explanation of administrative automation

We use electronic systems, including ionMy, to support the recording, management, monitoring and reporting of quality, safety and compliance activities. Depending on our configuration, these systems may generate notifications, reminders, calculated ratings and reports from information entered by authorised users and rules established by our organisation. Staff review and act on this information in accordance with our procedures.

Option 2 — Additional disclosure where relevant ADM is identified

We use [name or description of software] to [describe the kinds of decisions made solely by the software and/or the kinds of decisions substantially and directly informed by it]. In these processes, the software uses [describe the kinds of personal information about affected individuals]. [Where appropriate, explain staff review or oversight accurately.]

Customise the kinds of decisions and personal information; a generic statement about using software or AI may not meet the disclosure requirements.

Option 3 — Where no relevant ADM arrangement has been identified

If your assessment identifies no arrangements meeting the legal criteria, the new provisions may not require an additional ADM-specific privacy-policy disclosure. You may still explain ordinary administrative software use for transparency. The absence of AI does not, by itself, determine the outcome.

Part D — Important considerations

- ionMy is configurable; organisations may use different functions, rules and workflows.
- Notifications, reminders, risk ratings, Data Watch thresholds and human-reviewed category suggestions should be assessed in the context of their actual use.
- Human review does not, by itself, establish that an arrangement falls outside the legal requirements.
- Reassess when your configuration, decision-making processes or available product functionality materially change.
- This initial product guidance addresses ionMy and Frontline Assist.

Further guidance

Office of the Australian Information Commissioner (OAIC) — APP 1 guidance and automated decision-making transparency resources: 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.