

The 10 December Automated Decisions Deadline

On 10 December 2026 a new privacy transparency obligation commences. The compliance work happening across Australian businesses right now is aimed at CRMs, hiring tools and pricing engines.

Four questions in, four months out. New subclauses in **Australian Privacy Principle 1**, inserted by the **Privacy and Other Legislation Amendment Act 2024**, commence **10 December 2026**. They require an APP entity to disclose in its **privacy policy** the **kinds of personal information** used in automated decisions and the **kinds of decisions** made, where those decisions could reasonably be expected to **significantly affect the rights or interests of an individual**. It is *disclosure*, not a ban, not mandatory human review, not a right to an explanation of a specific decision.

■ The short version

What it is	What it is not
A disclosure in your privacy policy	A prohibition on automated decisions
Described in kinds, categories of information, categories of decision	A technical explanation of how your systems work
Policy-level and public	A right for an individual to demand reasons for a specific decision
Applicable to any computer program	Limited to artificial intelligence
Triggered by programs that contribute to a decision	Limited to programs that make the final call

■ Also worth knowing

Automated step	Stops at	Note
Menu selection routing (“press 1 for accounts”)	Gate 1	No personal information used at all
Business hours and holiday routing	Gate 1	Time, not identity
Overflow to voicemail after N calls waiting	Gate 1	Volume, not identity
Screen pop of the customer record to the agent	Gate 2	Informs a human; changes nothing for the caller
Routing to the owner of the account	Gate 2 or 3	Usually convenience. Assess it if “their” person is often unavailable and others are not offered
Priority queueing by customer tier	Gate 3	Differential access to a paid service, applied by rule. Assess properly
AI classification of why they rang	Gate 3, if it decides more than routing	If the classification determines whether they get an appointment, a hardship path or an escalation, it is in

If you answered no to question 1

You have nothing to do for December, but check the answer properly rather than assuming. The single most common mistake in this area is a business under the turnover threshold concluding it is exempt without noticing that it holds health information, or that it is part of a group. And note that several 2026 articles claim the small business exemption has already been abolished. Primary sources do not support that: it was left out of the 2024 tranche and deferred, not repealed. Do not plan around it vanishing, and do not plan around it lasting forever either.

■ Questions the full guide answers

- ☐ What is the 10 December 2026 privacy deadline?
- ☐ How do I know whether my business is even covered?
- ☐ Does this really apply to a phone system?
- ☐ What sort of thing does an audit actually find?
- ☐ Does automated scoring of our own staff count?
- ☐ What should the privacy policy paragraph say?
- ☐ What is a realistic plan between now and December?

This is the summary. The guide has the detail.

Every point above is worked through in full on our site, with the Australian context, the numbers and the exceptions. If you would rather talk it through, call 1300 663 222 or visit vocphone.com/about/contact-us.