

Service Description

Automated Decision-Making Register Setup

Scope

The Automated Decision-Making Register Setup is a targeted governance engagement that helps organisations identify, catalogue, and document systems that use algorithmic or AI-based decision-making. This includes internal tools, third-party SaaS platforms, and embedded AI functions used in decision-making processes affecting individuals or business outcomes.

The register supports compliance with upcoming regulatory reforms (e.g. Australian Privacy Act reform, GDPR Article 22, EU AI Act), and enhances transparency, accountability, and responsible use of AI-enabled systems in operational, HR, customer, and risk contexts.

Approach

This service is delivered over five phases, using privacy-by-design, AI governance, and record-keeping principles from ISO/IEC 42001 (AI Management System), NIST AI RMF (AI Risk Management Framework), and relevant privacy legislation.

Initiation & Scoping

Sets the foundation for engagement by confirming focus, priorities, and stakeholders.

- Confirm purpose of the register - compliance, internal governance, ethical use, procurement due diligence.
- Define scope - internal systems, vendor tools, embedded models, third-party SaaS using automated logic.
- Clarify definitions: - 'automated decision-making', 'significant effect', 'human involvement' (all terms used in the relevant legislation).
- Map key stakeholders: legal, privacy, IT, HR, operations, customer success, procurement.

Discovery & System Identification

Identify systems making or supporting algorithmic decisions, and confirm their scope.

- Conduct structured interviews and system inventory reviews to surface relevant systems.
- Identify and validate systems used for algorithmic decisions (e.g. eligibility, scoring, allocation, personalisation).
- Document decision types, model inputs, logic type (rules-based, ML), and human review processes, along with logging.
- Capture relevant documentation: privacy policies, data flows, model cards, impact assessments.

Register Design & Population

Populate a fit-for-purpose register that reflects legal and operational expectations.

- Develop custom register fields based on legal, ethical, and operational needs (e.g. purpose, data sources, legal basis, overrides, risk rating).
- Populate register with validated system entries and link to documentation (Privacy Impact Assessments (PIAs), risk assessments, contracts).
- Support classification of high vs low-risk decisions based on impact, scale, and human review.
- Define owner roles, update cycles, and quality controls for ongoing maintenance.

Validation & Alignment

Validate register entries and structure with key stakeholders.

- Review register entries and structure with Customer stakeholders (legal, privacy, governance leads).
- Validate high-risk designations and confirm acceptable thresholds / tolerances.
- Refine register structure to align with enterprise risk appetite and regulatory obligations.
- Document typical responsibilities for ownership, update cycles, and use in audits/reviews.

Reporting & Implementation

Deliver the live register and supporting guidance materials.

- Deliver final register and implementation guidance for ongoing use.
- Provide recommendations for register tooling (Excel, SharePoint, GRC platform, etc.).
- Advise on integration with existing compliance artefacts (privacy register, risk register, data inventory).



Value

The Automated Decision-Making Register creates the foundation for transparent and accountable use of algorithmic systems, reducing risk and ensuring readiness for regulatory scrutiny.

- Demonstrates compliance with privacy and AI laws regarding transparency and human oversight.
- Builds cross-functional visibility and accountability for automated decision systems.
- Reduces exposure to bias, complaints, and legal challenges linked to opaque decisioning.
- Strengthens internal governance, especially for HR, risk, and customer-facing decisions.
- Supports integration of AI use into enterprise compliance, audit, and risk cycles.

Benefits

The service delivers the following strategic and operational benefits.

- Builds accountability and supports regulatory oversight.
- Creates a repeatable structure for managing AI and automated decision-making risk.
- Enhances trust and transparency in AI system use.
- Reduces fragmentation across privacy, AI, and operational risk registers.
- **Ensures readiness per Privacy and Other Legislation Amendment Act 2024 - organisations must disclose if significant decisions are made using automated systems, including the data used and whether the process is fully automated - due 10 December 2026.**

Outputs

Final deliverables will include the following items to drive ongoing action.

- Automated Decision-Making Register: Documented inventory of relevant systems, risks, and owners.
- Decision Logic Map: Visual or tabular overview of how key decisions are best made.
- Validated Entries: Sample peer-reviewed register content with documented assumptions and thresholds.
- Governance & Maintenance Plan: Role definitions, update cycles, and quality assurance controls.
- Implementation Guide: Guidance for tooling setup, integration, and stakeholder training.



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