SUBMISSION

OAIC Consultation on Guidance for Transparency in Automated Decision Making

Collections and Financial Hardship: a sector-specific submission on automated decision-making transparency

Qurioux Solutions Pty Ltd | June 2026 | qurioux.com

Collections and financial hardship should be treated as a high-priority ADM guidance domain because automated treatment allocation, hardship eligibility, contact strategy, debt sale, bureau-score-informed decisioning and STP can directly affect statutory hardship rights, access to significant services, contractual outcomes, credit reporting and debt enforcement pathways. This is a nuanced, complicated and regulated area.

01 ABOUT QURIOUX SOLUTIONS

Qurioux Solutions is a specialist consulting firm focused on collections, hardship, and financial assistance transformation across Australia and New Zealand. We work with banks, non-bank lenders, telcos, utilities, debt buyers, and government agencies to design, review, and improve how organisations support customers experiencing financial stress.

Our work sits at the intersection of regulatory compliance, operational design, and technology architecture. We have direct, firsthand experience with how automated decision making (ADM) is used, and increasingly misunderstood, in collections and hardship environments in Australia.

Qurioux Solutions submits to the OAIC's consultation on automated decision-making transparency. This submission addresses the application of the ADM transparency obligation to collections and hardship functions within Australian financial services. Collections and financial hardship are domains in which automated systems routinely make, or substantially contribute to, decisions that affect individuals' financial circumstances, including decisions about hardship access, treatment allocation, contact strategy, and debt resolution pathways. This submission provides collections-specific responses to the consultation questions and examples drawn from Qurioux's direct experience reviewing and designing collections and hardship environments across Australia

02 WHY COLLECTIONS AND HARDSHIP ADM DEMANDS SPECIFIC ATTENTION

The most consequential automated decision-making in Australian financial services

Collections and hardship functions within financial services organisations now routinely use automated or algorithmically-assisted systems to make or inform decisions that directly and significantly affect the financial circumstances of individuals. These include:

- Segmentation algorithms (risk scores or channel effectiveness) that determine which customers are contacted, in what priority order, and through which channel
- Treatment selection systems that determine what hardship solution, deferral, arrangement, or restructure options are offered to a customer based on automated analysis of their account profile
- Eligibility decisioning tools that assess whether a customer qualifies for hardship assistance, what documentation is required, and whether their application proceeds or is declined
- Contact suppression logic that determines whether a customer's account is protected from collections activity, including during hardship assessment periods
- Risk scoring models that influence the intensity of collections activity applied to an account (risk scores, NPV (net present value), ABC(activity based costs), propensity models)
- Orchestration engines that schedule, sequence, and prioritise outbound contact across voice, SMS, email, and digital channels (propensity models, channel optimisation, RTC (right time to call))

Each of these decisions can reasonably be expected to significantly affect an individual's rights and interests. A customer whose hardship request is auto-declined or routed to an inadequate solution by an automated assessment tool may receive an outcome that does not reflect their actual circumstances, or that does not meet the sustainability requirements ASIC expects under REP 782. A customer whose hardship application is declined by an automated assessment tool, without any human review or clear explanation, may have a harder time understanding or challenging that outcome.

A customer incorrectly scored as high-risk may be placed in a more intensive or accelerated contact programme that is disproportionate to their situation.

> *These are not theoretical risks. They are documented in ASIC REP 782 (May 2024) and REP 815 (September 2025), which identified systematic failures across major Australian lenders in hardship identification, treatment appropriateness, and outcome oversight. The OAIC's ADM transparency obligation, if designed with collections in mind, can provide a meaningful additional layer of protection for customers who are among the most financially vulnerable people in Australia.*

03 RESPONSES TO CONSULTATION QUESTIONS

Full question-by-question responses with collections-specific evidence and examples

Note: This submission responds to the question numbering used in the OAIC's full Automated Decision-Making Transparency Obligation Issues Paper, rather than the abbreviated submission questions document.

Question 1: Factors for assessing whether a computer program substantially facilitates and is directly connected to a decision

> *OAIC question: What are the relevant factors to enable an entity to assess whether a computer program substantially facilitates and is directly connected to a human decision-maker's decision?*

Our ranking and collections-specific commentary

Degree of reliance on the ADM system output: Strongly Agree (5/5)

In collections environments, human agents frequently follow system-generated queues, scripts, and treatment recommendations while independently assessing for significant unexpected variation. A collector working through an orchestration system queue is, in practice, executing the system's decisions rather than making its own unless they observe or within the customer engagement uncover a variation to the expected treatment. A hardship trigger word or arrangement will change the account segmentation and strategy. Without new data or customer resolutions, the account will follow an automated treatment path with occasional human engagements (call work lists).

Ability and likelihood of human override: Agree (4/5)

Depending on the proposed solution, override capability exists in most systems but is rarely exercised at the volume and frequency that would make it a genuine safeguard. Where override requires additional steps, supervisor approval, or documentation that slows the collector's work, override rates are typically very low. The existence of a theoretical override does not reduce the substantiality of the system's role. For example available solutions, accept/decline proposals, treatment – next action. Obviously, this is different if the collector/agent/system has new or different data as the treatment/state is reflective of that. A bankruptcy flag will fundamentally change the expected automated treatment path.

Nature of the output, advisory versus determinative: Agree (4/5)

Outputs that can appear advisory but are presented within a constrained workflow effectively become determinative. If a system recommends Solution A and B but not Solution C, and the agent has no practical means of selecting Solution C without significant additional process, the output is functionally determinative. This can be driven by policy for example hardship solution C is not available for investment loans or customers where they have repeatedly failed previous arrangements/agreements.

Transparency and explainability of outputs: Agree (4/5)

If an agent cannot explain to a customer why they have been assessed as ineligible for hardship, or why their account has been placed in a particular treatment path, the system is producing decisions that are not explainable at the point of impact. The guiding industry principle is to ensure explainability that the solution is fair, reasonable, and consistent. All customers with the same score and data attributes should be treated within the same treatment path. Explaining to a customer that the scoring methodology has never been required.

Integration of ADM into decision-making workflow: Agree (4/5)

Where ADM is embedded in the core operational workflow such that agents cannot process cases without interacting with the system's outputs, the system is substantially and directly related to every decision made through that workflow.

Additional factor 1: Policy rules, SOPs, and delegated authority frameworks

If the policy itself says follow the system output unless you have specific delegated authority to do otherwise, and any override must be tracked and approved, then the policy has effectively made the system determinative.

In collections, policy and Standard Operating Procedures frequently require frontline collectors, not loan assessors, not managers, but frontline collectors, to accept system-proposed solutions or calculations as the default. The SOP states that the system recommendation should be accepted unless an exception applies. Any deviation from the system output requires a controlled deviation report, supervisor approval, a specific delegated authority level, or documented exception handling. Where this framework exists, the policy has made the system determinative.

This applies equally to provisioning calculations, treatment-selection outputs, and hardship-solution recommendations. If a system calculates a provisioning amount and the collector is expected to apply it unless a controlled deviation/exception is raised and approved, the system made the provisioning decision.

Additional factor 2: Straight through processing (STP)

Where policy and delegation rules permit a decision to be made end-to-end without human intervention, the system made the decision regardless of whether a human theoretically could have been involved. STP is common in collections for lower-risk or lower-balance accounts and is unambiguously in scope for the ADM transparency obligation.

The human tick box versus human oversight distinction

> Most organisations will say a human is involved in the decision. But if policy or SOP says accept the system output unless a controlled deviation is raised and approved, the system made the decision. The controlled deviation framework is proof of it. If deviation rates from the system suggestion are under 5-10%, that is FYI and exception-only catches. It is not genuine oversight.

Questions 2 and 3: Generative AI with human oversight

> *OAIC question: Would you consider a generative AI chatbot that summarises candidate profiles and provides eligibility recommendations, where humans always make the final decision, to be substantially and directly related to making decisions?*

Yes. Where a generative AI tool summarises customer circumstances and recommends eligibility, treatment, or escalation outcomes, it is substantially and directly related to the decision if staff ordinarily rely on the recommendation without applying independent judgment.

In the collections and hardship context, the equivalent scenario is an AI tool that summarises a customer's account history, arrears position, hardship application, risk score, vulnerability score and prior contact history, and recommends whether to approve, decline, restructure, or escalate. Where the hardship assessor follows the recommendation without independently reviewing the underlying circumstances, the AI tool is substantially and directly related to the hardship decision. More interesting is the digital portal to the customer, where there is no internal human intervention within the organisation. Just a customer to an AI bot.

Collections-specific examples of generative AI in scope include: AI tools that summarise customer circumstances and recommend hardship solutions; AI scripting tools that recommend what to say to a customer and which solution to offer during a live call; AI triage tools that assess hardship applications and produce an initial eligibility recommendation; and generative AI chatbots that assess customer financial circumstances through a digital portal and present solution options.

Questions 4, 5 and 6: Rights and interests, vulnerability, and significant services

> *OAIC questions: What factors increase the likelihood that a decision could affect rights or interests? What classes of person are vulnerable? What is a significant service or support?*

Question 4: Factors increasing likelihood of affecting rights or interests

We add five additional factors specific to collections and hardship:

- Financial stress as a consequence multiplier: for someone already in financial stress, an incorrect hardship solution or unsustainable arrangement does not just inconvenience them. It accelerates their path to a worse outcome. The harm compounds in a way it would not for a customer in good standing.
- Accelerated debt resolution triggered by system logic: if a model incorrectly scores a customer and the system triggers a demand letter or account closure pathway, that is not a recoverable situation without significant intervention.
- Missed customer triggers: if a model fails to flag a customer who should be identified for specialist hardship support, vulnerability pathway, or financial counsellor referral, the missed trigger is itself an ADM outcome with real consequences.
- Privacy risk from inferred sensitive data: a model trained on account behaviour might effectively identify vulnerability signals such as domestic violence indicators or mental health signals, and surface those in ways that create privacy risk. The model is making an inference about sensitive personal circumstances that the customer may not have explicitly disclosed, and that inference may be wrong.
- Stale data in segmentation: a customer who disclosed a health condition years ago and has since recovered may be routed to specialist pathways they no longer need. A customer whose circumstances have changed significantly may be treated based on who they were rather than who they are.

Question 5: Classes of persons considered vulnerable

Collections customers are often split between those who cannot pay and those who will not pay. Not all collections customers are vulnerable. Some are forgetful, have different financial priorities, are disputing the debt, or simply do not want to pay. Treating all collection customers as if they require specialist vulnerability pathways would be operationally unworkable and would dilute the protection available to customers who genuinely need it.

Vulnerability categories specific to collections and hardship:

- Mental health conditions: affecting capacity to engage, understand options, or sustain arrangements
- Physical health conditions: including chronic illness, disability, or recovery situations affecting income and capacity
- Domestic violence and financial abuse: including situations where a third party is exercising control over the customer's financial decisions
- Elder abuse: including situations where a customer's financial decisions are being made or influenced by others without their full consent
- Fraud victim: customers whose financial position has been affected by fraud or identity theft
- Financial stress itself: customers in arrears or seeking hardship assistance are in a contextually vulnerable position regardless of other circumstances
- Underemployment or recent income shock: temporary or structural reduction in income creating inability to meet commitments
- Over-indebtedness: customers managing debt across multiple creditors simultaneously

Question 6: Significant services: the prohibited activities framework

> *Rather than defining significance in the abstract, the OAIC should look to the existing prohibited activities frameworks in collections. These already identify which automated decisions are high stakes. The ADM that matters is the upstream decisioning that determines which pathway a customer takes before these defined outcomes occur: not the rule-based execution of the outcomes themselves.*

A critical distinction first: rule-based automation that fires the same way for every customer meeting a defined threshold is categorically different from genuine ADM that produces variable outputs based on customer-specific data analysis. The guidance should distinguish between these two types so entities do not obscure high-impact ADM inside generic disclosures about routine system automation.

Significant services in collections where ADM might be in scope:

- Default and credit listing: permanent damage to the customer's credit file affecting access to credit, housing, and essential services for years
- Demand notices: statutory triggers that start legal enforcement timelines. Once issued, the pathway becomes significantly harder to exit.
- DCA referral or debt sale: transfers the account to a third party with different obligations and often less capability to recognise or respond to vulnerability
- Account block or card block: immediate removal of access to essential banking services
- Service disconnection: removal of access to essential utilities or telecommunications
- Re-age or recontract: material change to the terms of the debt, with long-term financial consequences
- Payment arrangements: an automated system that offers an unsustainable arrangement, or fails to offer one when appropriate, can accelerate rather than prevent default

Question 7: Other legal frameworks relevant to rights and interests

> *OAIC question: Are there any other legal frameworks or policies that the OAIC should have regard to?*

Collections ADM sits at the intersection of consumer law, conduct regulation, and prudential standards simultaneously.

Framework	Why it matters for collections ADM
NCCP Act (sections 72-74)	Creates statutory hardship rights and corresponding legal obligations for lenders. ADM influencing whether a customer accesses these rights is operating directly inside an existing statutory rights framework. The rights affected are not merely interests: many are enforceable legal rights.
ASIC REP 782, REP 815, and RG 96	ASIC has already defined what good collections and hardship practice looks like. REP 815 (September 2025) confirmed enforcement action. The ADM transparency obligation should be understood as complementary to existing ASIC conduct expectations, not a separate regime.

APRA APS 220 / APG 220	Re-age and recontract decisions: provisioning models define what counts as a concession or modification for staging under IFRS 9. ADM that applies or withholds re-age solutions makes decisions with prudential consequences. Evidence requirements for hardship: automated tools that set documentation thresholds are making decisions that are simultaneously a customer experience question and a prudential compliance question.

Questions 8 and 9: Differential treatment: the collections equivalent of differential pricing

> *OAIC question: Would inflating prices based on postcode data be considered to significantly affect the interests of an individual?*

The closest collections equivalent to differential pricing is differentiated treatment: using customer risk, affordability, vulnerability, and engagement signals to determine the most appropriate pathway, contact intensity, escalation point, and hardship solution. Two customers with identical face-value debt may receive entirely different treatment based on an algorithmic assessment of their profiles.

NPV (Net Present Value) based treatment optimisation: the strongest parallel

The most direct collections equivalent to differential pricing is NPV-based treatment optimisation. A model compares the expected net value of multiple pathways for the same debt and routes the account accordingly.

Pathway	NPV logic and when appropriate
Retain and collect internally	Expected payments over time, less collection cost, less complaints and conduct risk, discounted for time and cure probability. Appropriate where customer has reasonable affordability and engagement.
Place with contingent DCA	Expected agency recovery less commission, less oversight cost, less conduct risk. Appropriate where internal capacity is constrained or specialist agency may recover more effectively.
Debt sale	Immediate sale proceeds less preparation cost, compared against probability-weighted internal recovery. Appropriate where expected internal recovery is low, debt is aged, or balance sheet certainty is preferred.
Waiver, write-off, or partial forgiveness	Where recovery is minimal or negative and ongoing collection creates more cost, harm, and regulatory risk than the expected recovery justifies. Economically rational, not just compassionate.

Four customers, same debt face value, four entirely different outcomes driven by expected net value calculations:

Customer	Expected pathway	Why

Customer A	Internal hardship restructure	Good engagement, temporary income shock, high chance of sustainable repayment
Customer B	Contingent DCA	Disengaged, moderate balance, agency may recover more than internal team – possible skip
Customer C	Debt sale	Aged debt, low engagement, low internal recovery likelihood, sale gives immediate certainty
Customer D	Waiver or write-off	Vulnerability, no affordability, ongoing collection creates more cost and harm than recovery

> NPV-based treatment optimisation are not a purely commercial model. For hardship and regulated collections, the model uses non-financial constraints built in: vulnerability exclusions, hardship obligations, responsible treatment requirements, sale eligibility rules, complaints risk weighting, legal enforceability, and fairness controls. Disclosure should identify that commercial optimisation logic is used and describe the non-commercial guardrails at a category level: without requiring publication of proprietary model weights, thresholds, or commercially sensitive scoring logic.

Question 10: Should failing to act count as a decision

> *OAIC question: Should it be considered a decision that Rafqa did not receive the Manscon job ad?*

Algorithmic collections decisioning can determine not only what action is taken against a customer, but also what help, discount, waiver, channel, or hardship pathway is made visible or available to them. The OAIC legislation expressly includes refusing or failing to make a decision or do a thing. The harm in collections often lies precisely in what the customer was never offered.

The following eight use cases illustrate this: in each scenario, the meaningful decision is what the customer does not receive:

Use case	Decision question
1. Hardship channel propensity model: A lender uses a model to predict channel preference and promotes only the predicted channel. A customer who would benefit from direct agent support but is routed to digital self-service may not access the more appropriate option.	Should it be considered a decision if a customer is not directed to the online hardship portal but instead to agent-led support?
2. Digital engagement model for hardship outreach: A model determines which customers receive proactive hardship nudges. Customers with lower digital access, disability, older age, language	Should it be considered a decision if a customer does not receive proactive digital hardship outreach because the model predicts low digital engagement?

barriers, or lower trust in digital channels may not receive early hardship digital support.	
3. Channel-based discount or waiver strategy: Customers paying through the self-service portal are offered full payment only. Customers who call the call centre may access fee waivers, payment plans, or settlement discounts.	Should it be considered a decision if a customer using the portal is only offered full payment, while a customer using the call centre can access waivers or discounts?
4. Propensity-to-pay model selecting offer type: A model predicts likelihood to pay in full. Customers predicted to pay without incentive may not be shown settlement or waiver options.	Should it be considered a decision if a customer is excluded from a settlement or waiver offer because the model predicts they are likely to pay without one?
5. NPV model for pathway allocation: A model determines whether an account is retained, placed with a DCA, sold, settled, waived, or written off. A customer whose debt is selected for sale rather than hardship review has had a life-changing decision made without any visibility into the logic.	Should it be considered a decision if a customer's debt is selected for sale rather than retained, settled, waived, or managed through hardship?
6. Vulnerability flagging based on life-stage indicators: A model uses age or life-stage signals to route customers to specialist handling or exclude them from certain campaigns. Age can be either protective or exclusionary.	Should it be considered a decision if an age-based vulnerability flag changes the collections pathway, offer set, or channel available to a customer?
7. Portal design and offer visibility model: A model determines what options appear in the customer's self-service portal. A customer who does not see a hardship treatment solution option may not know they are entitled to one.	Should it be considered a decision if the portal does not show a hardship, waiver, or settlement option to a customer?
8. Assisted-channel override model: An operation allows agents to apply waivers and concessions while digital channels are restricted. Customers who avoid phone conversations due to embarrassment, language barriers, trauma, disability, or cultural concerns may receive fewer concessions.	Should it be considered a decision if the availability of a waiver or hardship concession depends on the channel the customer uses?

Question 11: Scenarios requiring guidance on 'arranged for'

> *OAIC question: Are there any scenarios relevant to the meaning of 'arranged for' that you consider require guidance?*

Scenario	Guidance needed
1. Third-party debt collections agencies (DCAs) and lender placement: DCAs use their own scoring models and segmentation logic, not the originating lender's models, on the customer data provided at placement.	Where accounts are placed with a DCA acting on behalf of the lender, guidance should clarify whether the lender, the DCA, or both have disclosure obligations. The guidance should distinguish between placement, outsourcing, agency arrangements, and debt sale, as the arranged for responsibility differs in each scenario.
2. Credit bureau scores as ADM inputs: Bureau-sourced risk scores from Equifax, Experian, and illion are used as key inputs into collections treatment decisioning. The lender did not build or control the scoring model. The bureau did. But the lender has arranged for the score to be used in decisions affecting their customers.	Guidance is needed on how disclosure obligations apply where third-party bureau scores are a substantial input into collections ADM. Neither the lender nor the bureau currently discloses this arrangement meaningfully to customers.
3. Bureau triggers and real-time credit file monitoring: A lender arranges for the bureau to monitor a customer's credit file and fire an automated trigger when a defined event occurs: a new default listing, score movement, or new credit application: initiating an automated collections action.	The customer has no visibility into whether their credit file activity is being monitored in real time and whether specific events are automatically triggering collection actions. Note: Australian bureau scoring is provided by Equifax, Experian, and illion.
4. Collections platform execution versus internal scoring: Major collections platforms such as Pega and Experian PowerCurve usually do not generate their own proprietary system scores or models. They execute the logic configured by the lender. The disclosure obligation sits clearly with the lender, not the platform vendor.	Organisations may incorrectly assume that using a third-party platform transfer or dilutes their ADM disclosure obligation. The guidance should make clear of scope.
5. Third-party contact optimisation systems: Systems such as FICO Customer Communication Services make or substantially inform decisions about how and when to contact customers in collections, including channel selection, timing optimisation, and contact frequency. The lender has arranged for the third-party system to operate these decisions.	The guidance should make clear if the disclosure obligation sits with the lender, regardless of whether the underlying optimisation logic was built by the lender or the vendor.

Question 12: Meaningful and accessible disclosure

> *OAIC question: Is there anything additional that entities should disclose to provide effective and meaningful disclosures about ADM?*

The most important principle: do not add ADM disclosure to the customer's real-time interaction. Customers experiencing financial stress or hardship are operating with severely reduced cognitive and emotional capacity. Collections and hardship interactions already carry an extremely high disclosure burden. Adding an ADM transparency statement to this interaction stack would not improve customer understanding. It would reduce comprehension across all disclosures, including those most important for protecting the customer's immediate interests.

ADM and STP (straight through processing) are often genuinely beneficial for customers in financial difficulty. Automation that removes friction, speeds up access to arrangements, eliminates unnecessary human conversations, and enables self-service resolution at any hour is frequently what customers want and need. The goal is not to make customers suspicious of automation. It is to ensure they can understand what happened and contest outcomes when things go wrong.

Four principles the OAIC's guidance should address for collections and hardship:

- **Specificity of disclosure.** At what level of specificity must entities describe the categories of automated decisions and the personal information used in them? This is particularly complex in collections and hardship where automated systems operate across multiple layers: from workflow and treatment routing that executes predefined rules, through to scoring models and decisioning engines that produce variable outputs based on customer-specific data analysis. These are materially different in their risk profile and their transparency implications. Generic language such as "we use automated systems to manage customer accounts" does not differentiate between these layers and may not give customers in collections and hardship sufficient information to understand why they received a particular outcome or where to direct a query. The guidance should clarify the minimum standard and whether disclosure obligations differ between rule-based workflow execution and model-driven decisioning.
- **Signposting existing review rights.** Where rights to contest or review outcomes already exist under the NCCP hardship framework, AFCA, internal dispute resolution, or ASIC's conduct expectations, how should ADM disclosures interact with those existing rights? Guidance should address whether ADM disclosures are expected to direct customers toward existing review mechanisms.
- **Point of disclosure.** Customers in financial stress are unlikely to navigate to a privacy policy at the point they need the information. The guidance should address whether ADM disclosures should be accessible beyond the privacy policy, for example linked from decline letters or treatment notifications, without being added to the verbal or written disclosure stack at the point of customer contact.
- **Plain language standard.** What is the appropriate plain language benchmark for ADM disclosures in collections and hardship? This cohort includes customers with limited financial literacy, limited English, and reduced cognitive capacity due to financial stress. The guidance should clarify whether the plain language standard is set for an average reader or for the least advantaged person reasonably likely to be affected.

04 SUMMARY RECOMMENDATIONS

Qurioux Solutions recommends that the OAIC's guidance specifically address collections and hardship as a high-priority application domain

- That hardship eligibility assessment, treatment selection, contact strategy, NPV-based pathway allocation, and bureau-score-informed decisioning be explicitly identified as decision types that significantly affect the rights and interests of individuals
- That customers in financial difficulty be recognised as a vulnerable group, while acknowledging that not all collections customers are vulnerable and that ADM and STP can be genuinely beneficial for customers who prefer automated and self-service pathways
- That the OAIC's guidance clearly distinguish between genuine ADM (variable outputs based on customer-specific data analysis) and rule-based automation of compliance timelines (fixed outputs identical for all customers in a defined state)
- That straight through processing (STP) be explicitly addressed as ADM in scope where policy and delegation rules permit end-to-end decisions without human intervention
- That the policy and SOP test be recognised as a practical test for ADM scope: where policy requires the system output to be followed unless there is a specific delegated authority or documented override process, the system is making the decision
- That the human tick box versus human oversight distinction be addressed: where policy, SOPs, or delegation frameworks require collectors to accept system outputs unless a controlled deviation is raised and approved, the system is making the decision. The existence of controlled deviation reporting requirements, and deviation rates below 5-10%, are evidence that the system output is the default and human departure is the exception
- That bureau triggers and real-time credit file monitoring be addressed as ADM in scope given customers have no visibility that credit file events are automatically triggering collections actions
- That bureau score inputs from providers such as Equifax, Experian, and illion be addressed in guidance on third-party ADM disclosure obligations
- That guidance address the full 'arranged for' chain in collections, including originating lender obligations regarding DCA ADM, platform execution versus internal scoring, and third-party contact optimisation systems
- That ADM disclosure in collections and hardship not be added to the customer interaction disclosure stack, given the cognitive and emotional capacity constraints of customers in financial stress and the already significant disclosure burden in collections
- That ADM disclosures instead be accessible, clearly signposted, and easy to find when customers need them, particularly when contesting outcomes
- That plain language requirements be designed for the least financially literate and most cognitively stretched customer, not the moderately informed consumer reading at leisure
- That the right to request human review be framed around signposting existing NCCP, AFCA, and internal dispute resolution rights rather than creating new obligations beyond the Privacy Act requirements

We are available to discuss this submission and to provide additional context from our work across the Australian collections and hardship sector. We would welcome the opportunity to contribute to any stakeholder roundtable or working group as the OAIC develops its guidance.

Qurioux Solutions Pty Ltd
sacha@qurioux.com | kris@qurioux.com | qurioux.com
ABN 81 682 026 615