

16/12/2025

Stakeholder Consultative Group Secretariat  
Medical Benefits and Veterans Division  
Services Australia

Via email: [SCG.SECRETARIAT@servicesaustralia.gov.au](mailto:SCG.SECRETARIAT@servicesaustralia.gov.au)

Dear SCG Secretariat,

### **Draft Automation and Artificial Intelligence Ethics Framework 2025-2027**

Thank you for the opportunity to comment on the draft Automation and Artificial Intelligence (AAI) Framework 2025-2027.

Ageing Australia is the national peak body representing providers across the aged care sector, including retirement living, seniors housing, residential care, home care, community care and related services.

Ageing Australia strongly supports the development of AAI Ethics Framework to help guide and support Services Australia to:

- achieve safer, more reliable and fairer outcomes for consumers, staff and stakeholders
- reduce the risk of adverse impacts on those affected by the introduction and use of AAI, and
- practice the highest ethical standards when procuring or designing, developing and implementing AAI.

This submission has been prepared from an aged care perspective. It focuses specifically on its implications for older Australians, their families and carers, and the aged care sector.

#### **Introduction**

Ageing Australia acknowledges that automation and AI-enabled systems are increasingly used to drive improvements in areas central to older people's wellbeing, including aged care assessments, income support, health entitlements, compliance functions and customer interactions. Yet the risks associated with AI-driven systems are heightened for older Australians, whose vulnerability is shaped by system design.

The draft Framework provides a strong foundation for ethical oversight. However, Ageing Australia believes that introducing additional safeguards would ensure that older Australians are consistently protected from unintended harm and are able to realise the benefits from AAI-enabled public services.

This submission recommends strengthening the Framework across seven priority areas:

1. Explicit recognition of older Australians as a high-risk priority population

#### **Ageing Australia**

Suite 2, Level 2, 176 Wellington Parade | East Melbourne VIC 3002 Australia

ABN 19 659 150 786 | [ageingaustralia.asn.au](http://ageingaustralia.asn.au) | [info@ageingaustralia.asn.au](mailto:info@ageingaustralia.asn.au)

2. Enhanced user-centred design that is age-inclusive and accessibility-focused
3. Stronger requirements for fairness, bias testing and representativeness for older cohorts
4. Clear expectations for transparency, explainability and contestability in aged care service systems
5. Strengthened monitoring, governance and escalation mechanisms for systems affecting older people
6. Clearer requirements for consultation and co-design with older people, carers and advocacy groups
7. Structural improvements to embed aged-care considerations throughout the Framework

### **Recognise older Australians as a priority cohort**

The Framework references vulnerable communities in general terms but does not explicitly identify older Australians, despite being a group highly susceptible to algorithmic, communication and design-related risks.

Older people may experience:

- lower digital literacy
- difficulty interpreting automated communications
- higher reliance on government payments and care services
- cognitive decline or disability impacting comprehension
- sensory or mobility impairments
- challenges navigating appeals or contestability processes

#### *Recommendations*

**R1** Explicitly identify older Australians as a priority population within the Ethics Statement and Ethics Assessment processes.

**R2** Require initiative owners to assess age-related impacts and outline mitigations.

### **Strengthen age-inclusive, accessible, human-centred design**

Older Australians often rely on carers, advocates or authorised representatives to interact with government services. Automated systems can unintentionally reduce access if not designed with these needs in mind.

Key concerns include:

- inaccessible digital interfaces
- over-reliance on online channels
- readability issues (small text, overly technical language)
- inability to understand AI-generated recommendations or decisions

#### *Recommendations*

**R3** Mandate older-person involvement in co-design and user-testing, especially for initiatives affecting eligibility, payments, or aged care pathways.

### **Improve fairness, bias and equity protections**

AI systems can inadvertently encode age-based discrimination or disadvantage older people through:

- under-representation in training datasets
- biased risk scoring or fraud algorithms
- deterministic automation that does not account for complex medical or social circumstances

Ensuring fairness for older Australians requires deliberate bias testing, disaggregated performance analysis and attention to intersectional factors such as disability, cultural background, language, and rurality, all of which shape the way older people experience automated systems.

#### *Recommendations*

**R4** Require age-specific bias testing and disaggregated performance analysis for all automation/AI initiatives.

**R5** Mandate analysis of intersectional vulnerabilities (e.g., age, CALD background, disability, location, socioeconomic status).

#### **Strengthen transparency, explainability and contestability**

For automation and AI systems to be trusted, older Australians must be able to clearly understand when decisions or interactions are being influenced by technology. However, older people are more likely to experience difficulty interpreting digital instructions, differentiating automated outputs from human interactions, or understanding the implications of AI-assisted decisions.

Lack of transparency can create confusion, anxiety, or fear—particularly when communications relate to compliance, payments or aged care eligibility. Additionally, older people may not know how to question or challenge AI-generated decisions, or they may face barriers navigating complex appeal pathways without support.

Ensuring clear communication, accessible information, and easy access to human review is essential to uphold procedural fairness and protect older Australians from harm.

#### *Recommendations*

**R6** Set clear standards for transparent disclosure to older customers when AI assists in making a decision, or automated systems significantly influence outcomes.

**R7** Require plain-language notifications, larger font and accessible formats and audio or translated versions where relevant

**R8** Strengthen contestability by requiring:

- simple, accessible pathways for human review (the ability for a person to question, challenge, or appeal an automated or AI-influenced decision)
- support for carers and authorised representatives
- information on how to challenge or appeal decisions

#### **Enhance governance, monitoring and accountability for aged care impacts**

AI and automation systems deployed in government contexts can have significant and immediate impacts on older Australians' financial security, healthcare access, and continuity of aged care services.

AI-driven errors can cause disproportionate harm to older Australians—such as suspension of payments, misclassification of eligibility, or misinterpretation of compliance signals.

Strong governance structures, oversight by senior decision-makers, and clear system pause-or-reverse protocols are necessary to protect older Australians from systemic issues, model drift, algorithmic bias or design flaws that could disproportionately impact their safety, wellbeing or access to care.

### *Recommendations*

- R9** Classify all initiatives impacting aged care, health entitlements, or income support as requiring higher-tier governance oversight.
- R10** Mandate that monitoring dashboards include age-disaggregated indicators such as error rates, system drift, complaint patterns, and adverse impacts.
- R11** Define triggers for pausing or rolling back AI systems when risks to older people emerge, including psychological distress or loss of access to essential services.

### **Strengthen consultation and co-design requirements**

Older people and their carers possess essential lived experience that cannot be replicated through data alone. Their insights into accessibility, cognitive load, communication challenges, cultural safety, trust and system navigation are critical for designing AI systems that genuinely meet their needs.

However, older populations—particularly those from CALD, Indigenous, rural, remote and disability communities—are often underrepresented in digital policy consultations. Without structured, mandatory engagement, government systems risk being developed without understanding the practical realities older Australians face.

Co-design not only improves usability and fairness but also strengthens trust, transparency and acceptance of AI technologies in aged care contexts.

### *Recommendations*

- R12** Require consultation with older Australians, aged care providers, dementia, disability and CALD advocacy groups, and representatives of First Nations Elders.
- R13** Require documented evidence of how lived experience feedback shaped the initiative.

### **Improve structure and explicit integration of aged-care considerations**

While the draft Framework provides general ethical foundations, it does not yet systematically embed aged-care-specific considerations across its assurance processes, risk assessments or governance requirements.

Given that older Australians represent one of the most significant and vulnerable user groups interacting with Services Australia and aged care programs, a more explicit structural integration is required. Clearer visibility of aged-care impacts—through dedicated sections, examples and case studies—will ensure initiative owners consistently identify and address risks, rather than treating aged-care considerations as optional or implicit.

Strengthening the structure of the Framework will embed accountability and promote consistently higher safety and ethical standards across all automation and AI systems affecting older users.

### *Recommendations*

- R14** Add a dedicated section on “Impacts on Vulnerable Populations,” with explicit reference to older people.
- R15** Include aged-care-related case studies illustrating automated assessment pathways; communications regarding aged care payments; eligibility or compliance algorithms; and fraud detection impacts on older customers

## **Conclusion**

The Draft AAI Ethics Framework 2025-2027 represents a significant and necessary step in embedding ethical decision-making into the design, implementation and operation of automation and AI systems across Services Australia.

Strengthening the Framework's focus on the needs and vulnerabilities of older Australians will ensure these technologies support—not unintentionally disadvantage—one of Australia's most important and diverse population groups.

By adopting the recommendations outlined in this submission, Services Australia will reinforce its commitment to safe, fair, respectful, accessible and inclusive service delivery for older Australians and the broader aged care ecosystem.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Nick Elmitt', with a horizontal line extending to the right.

Nick Elmitt  
Head of Quality and Research