AUSTRALIA AND NEW ZEALAND · NOVEMBER 2026

My AI *Map* Checklist ✦

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Neither Australia nor New Zealand has an AI Act in force. Your AI is already covered by existing laws: privacy, consumer law, financial services rules, online safety, copyright, discrimination and directors' duties. Start with three questions. Tick each box as you go.

1. Where is your AI?

- [ ] List every AI tool and use case across the business.
- [ ] Include staff using public AI tools, even if no one signed off on them.
- [ ] Include the AI built into software you already pay for.
- [ ] Note every use that touches personal information. Privacy law applies.
- [ ] Note anything you sell into the EU, or any AI output used there. The EU AI Act can apply.

2. Who owns it?

- [ ] Name **one accountable person** per use case. A person, not a team.
- [ ] Name a board or leadership sponsor.
- [ ] Set a review date for each use.
- [ ] In financial services? Check APRA's expectations (an AI inventory, lifecycle ownership, human involvement in high-risk decisions, supply chain mapping, continuous monitoring) or, in New Zealand, the RBNZ and FMA expectation that boards know where AI is used and who is accountable.

3. What does it decide?

- [ ] Flag every decision that could significantly affect a person: for example credit, hiring, pricing or service.
- [ ] For each one, note whether a computer program makes it or substantially and directly assists it, and what personal information it uses.
- [ ] Australian businesses covered by the Privacy Act: update your privacy policy to explain these **before 10 December 2026**.
- [ ] Decide where a human stays in the loop, especially for high-risk decisions.
- [ ] Check AI-driven marketing, chatbots, checkout, pricing and subscription flows before the unfair trading practices ban starts on 1 July 2027.

YOUR AI REGISTER

One line per AI *use*

Answer the three questions for every use and you have the start of an AI register. Copy this page as often as you need. The first row is an example only.

Use case	Tool / vendor	Owner (one person)	What it decides	Personal info? Y/N	Significant effect on people? Y/N	Human in the loop	Review date
Example: website chatbot answering customer questions	*Chatbot vendor*	*Head of Customer*	*Answers questions, routes complaints*	*Y*	*N*	*Team reviews escalations*	*Quarterly*

Tip: the National AI Centre's Guidance for AI Adoption includes an AI register template you can use instead.

THEN

Next *steps*

- [ ] **Write a short AI policy.** Use the National AI Centre template (Australia) or MBIE's Responsible AI Guidance for Businesses (New Zealand) as a base. Cover approved tools, personal information and human review.
- [ ] **Check your AI marketing claims.** Make sure every AI claim can be backed up. Overstating what your AI does is misleading conduct under the Australian Consumer Law.
- [ ] **Tighten vendor contracts.** Ask for data use terms, audit rights, notice of model changes and incident notification.
- [ ] **Brief the board.** Directors' duties of care and diligence apply to AI decisions. Use the AICD guide, and set AI risk appetite and reporting.

Dates to *diarise*

10 Dec 2026	AU	Privacy policies must say when a computer program makes, or substantially and directly assists, decisions that could significantly affect a person, and what personal information it uses.
Early 2027	AU	Australian AI Standards bill expected. Targeted, not yet introduced. No exposure draft yet, and the scope is still unclear.
1 Jul 2027	AU	Unfair trading practices ban starts: dark patterns, subscription traps, drip pricing.
2 Dec 2027	EU	EU AI Act high-risk rules for systems such as hiring, credit and education.
2 Aug 2028	EU	EU high-risk rules for AI built into regulated products.

The EU dates apply to Australian and New Zealand firms that place AI on the EU market, or whose AI outputs are used in the EU. Dates as at 11 November 2026. Anything proposed can change.

Delegate the work. Never delegate *accountability*. ✦