

CASE STUDY · AUSTRALIA · 2025 TO 2026

Commonwealth Bank's voice bot reversal.

How 45 call-centre roles were declared redundant, then not, in 23 days, and what boards can take from it.

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ABOUT YOUR SPEAKER



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Twenty-five years leading digital and AI transformation across Asia and the Middle East: national smart-city programmes, critical infrastructure and enterprise operations. Today I help leadership teams put AI into production with controls they can show a board, an auditor and a regulator.

Built	A governed AI platform serving more than 6,000 engineers, with zero security incidents
Certified	ISO/IEC 42001 Lead Auditor Professional (BSI) · AIGP (SMU) · Registered Management Consultant
Serving	CTCB CPSC Advisory Board · UN ESCAP AI for Developing Countries Forum
Awards	CDO Vision Award 2026 · Singapore's Most Influential Data & AI Leaders 2026 · Google Trailblazer Transformation Award 2024

Independent analysis from public sources. The views in this session are mine.

THIS SESSION

Seven parts, from the call centre to the boardroom.

01 The call centre before the bot

CUSTOMER SERVICE DIRECT, 2024 TO MID-2025

03 The law and the record

WHAT “NOT REDUNDANT” MEANS UNDER THE FAIR WORK ACT

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ANNOUNCEMENT, DISPUTE, REVERSAL

04 What CBA did next

2026: PROGRAMME, CUTS AND A NEW WAY OF TALKING ABOUT AI

06 Why it matters for AI

TRIAGE, EVIDENCE AND ATTRIBUTION

THE SHORT VERSION

A headcount decision taken on an early, unpublished reading of what an AI system had done.

45

call-centre roles in Customer Service Direct declared redundant on 29 July 2025 [23]

2,000

fewer calls a week: what CBA told the union. Never published [24][11]

23

days until CBA said the roles were not redundant and apologised [26]

0

tribunal rulings. CBA conceded before the listed hearing [12][13]

Sources: iTnews, 29 July 2025 [23]; Yahoo Finance, 29 July 2025 [24]; Finance Sector Union, 7 and 21 August 2025 [11][12][13]; CBA statement via Digital Nation, 21 August 2025 [26].

PART 1

The call centre before the bot.

Customer Service Direct, 2024 to mid-2025.



2024

Customer Service Direct answers the bank's customer calls.

2,400+

call-centre staff

CBA's count when it began trialling Hey CommBank, a text-based AI chat tool, in September 2024 [33]

50,000

customer contacts a day

The volume the same staff handled, as reported in September 2024 [33]

158

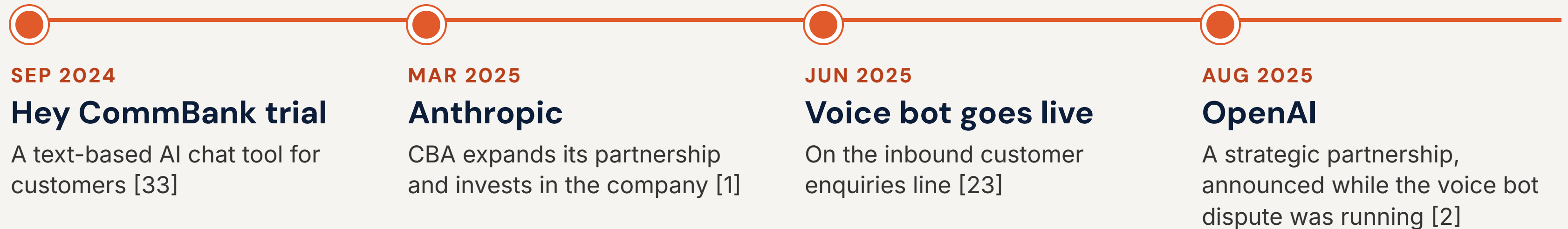
roles made redundant in June 2024

The union's report; the people were to move into broader roles [8]

Also called direct banking. Sources: Information Age, 17 September 2024 [33]; Finance Sector Union, 26 June 2024 [8].

CONTEXT

AI was a stated priority at board level.



Sources: Information Age [33]; CBA media releases, 14 March and 13 August 2025 [1][2]; iTnews, 29 July 2025 [23].

THE SYSTEM

The voice bot triaged calls and passed them to staff.



“By automating simple queries, our teams can focus on more complex customer queries that need empathy and experience.”

CBA spokesperson, 29 July 2025 [23][24]

It was a voice bot on the phone line; several headlines called it a chatbot. No public source names the vendor or the technology. Sources: iTnews [23]; Finance Sector Union, 29 July 2025 [9].

PART 2

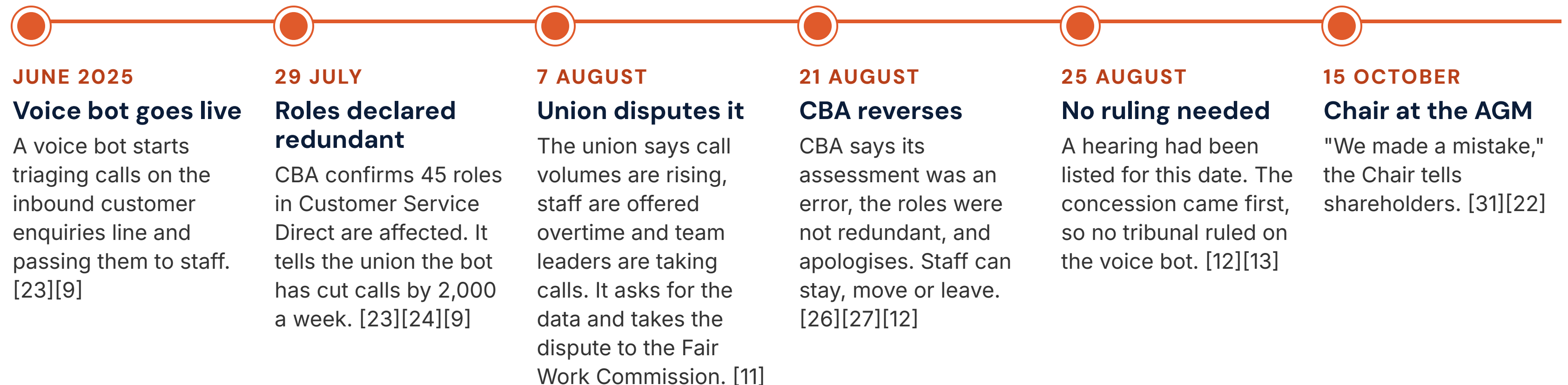
The 23 days.

29 July to 21 August 2025: announcement, dispute and reversal.



THE SEQUENCE

From go-live to “We made a mistake” in four months.



29 JULY 2025

CBA confirmed 45 roles were affected by the voice bot.

The roles

45 call-centre roles in Customer Service Direct, on the inbound phone line [23]

The reason given

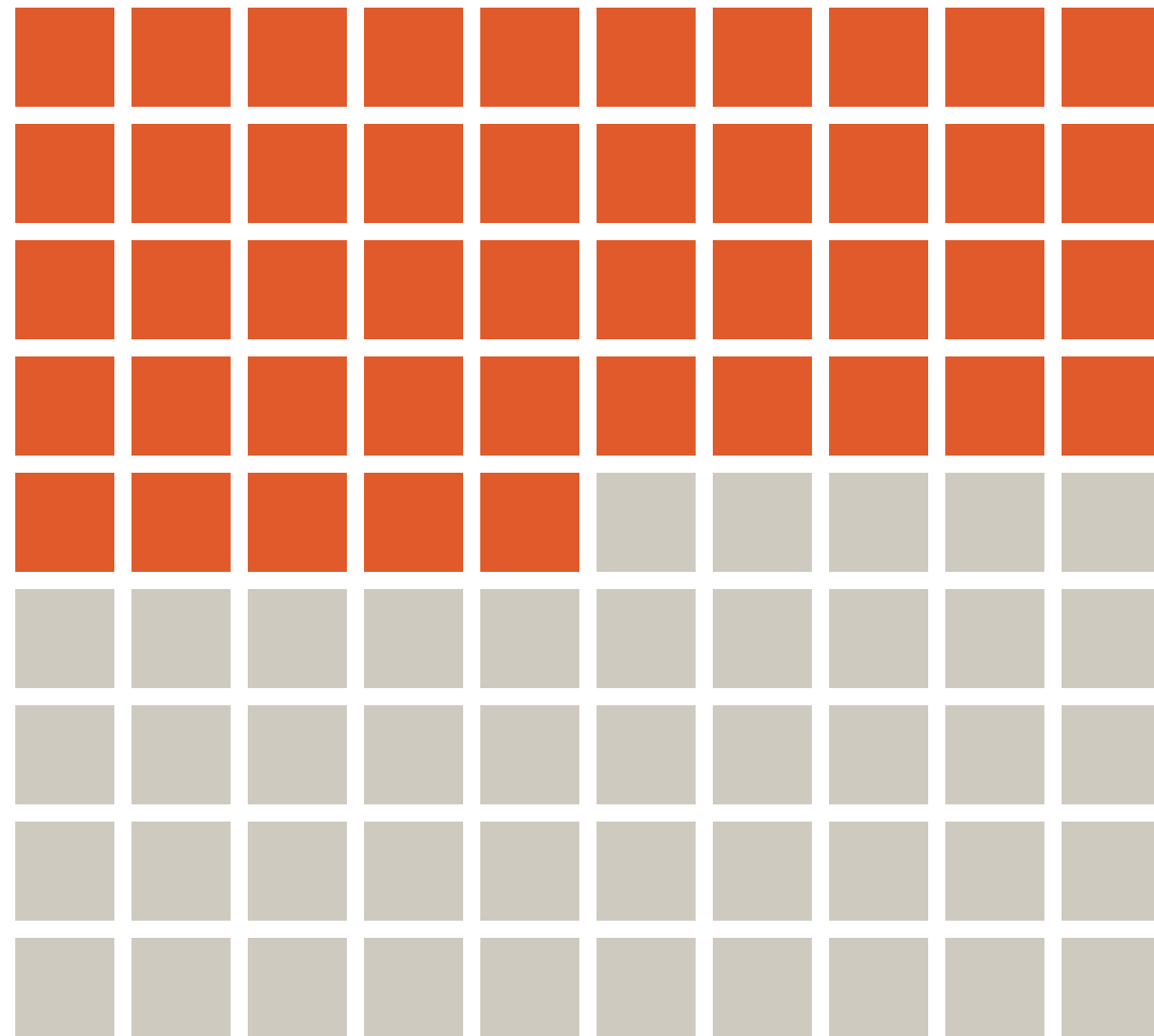
Automating simple queries so teams could focus on complex ones [23][24]

The number

CBA told the union the bot had cut calls by 2,000 a week, in a briefing. It is in no CBA document that could be found [24][11]

TWO NUMBERS

The union's count of 90 included roles outside the reversal.



45 call-centre roles

In Customer Service Direct. These are the roles CBA later said were not redundant [23][26]

The rest of the union's 90

Included customer messaging roles the union says were moving to CBA India. CBA did not confirm that split [9][10]

Keep them apart

No evidence was found that the messaging roles were reinstated. The reversal covers the 45 only [26]

One square is one role. Sources: CBA via iTnews, 29 July 2025 [23], and Digital Nation, 21 August 2025 [26]; Finance Sector Union, 29 July 2025 [9][10].

THE UNION'S RESPONSE, 29 JULY 2025

"Just when we think CBA can't sink any lower, they start cutting jobs because of AI on top of sneakily offshoring work to India."

Julia Angrisano, National Secretary, Finance Sector Union [9]

From that day the two issues, automation and offshoring, ran together in the coverage. They need to be kept apart to read the case.

THE EVIDENCE FOR THE DECISION

The number behind the cuts was never published.

CBA TO THE UNION, JULY 2025

The bot had cut call volumes by 2,000 a week.

Never published by CBA. The union says it was never substantiated. [24][11]

THE UNION, AUGUST 2025

Volumes were rising. Staff were offered overtime and team leaders were put on the phones.

The union's account. CBA did not publish data to rebut it. [11]

CBA STATEMENT, 21 AUGUST 2025

The assessment "did not adequately consider all relevant business considerations".

CBA's own words. It did not publish the call data either way. [26]

Sources: Yahoo Finance, 29 July 2025 [24]; Finance Sector Union, 7 August 2025 [11]; CBA statement via Digital Nation, 21 August 2025 [26]. No call-volume data from CBA has been published.

7 AUGUST 2025

The union took a practical case to the Fair Work Commission.

Call volumes were going up

Not down, as the 2,000-calls claim implied

Staff were offered overtime

In the same team whose roles were redundant

Team leaders took calls

Taken off their own work to answer the phones

No data behind the claim

CBA had not backed the 2,000-calls figure with data

No risk assessments

CBA refused to provide its work health and safety risk assessments

No selection criteria

Nor the criteria it used to choose the roles

All points are the union's account [11]. None has been tested by a tribunal, and CBA did not publish data to rebut them.

21 AUGUST 2025 · CBA STATEMENT

“CBA’s initial assessment that the 45 roles in our Customer Service Direct business were not required did not adequately consider all relevant business considerations and this error meant the roles were not redundant.”

CBA statement, full text via Digital Nation [26]

- Apologised to the employees concerned
- Offered each person a choice: stay, be redeployed within CBA, or leave
- Said it was reviewing its internal processes

THE REVERSAL

The concession came before the hearing, so no tribunal ruled.

The union's account

Management told it the bank "didn't properly consider that an increase in calls would continue over a number of months". CBA's own statement does not mention call volumes [12].

The listed hearing

A hearing at the Fair Work Commission was listed for 25 August 2025. CBA reversed on 21 August. No ruling on the voice bot has been published [12][13].

What is not public

How many of the 45 stayed, moved to another role or left has not been published [26] [12].

THE UNION, 21 AUGUST 2025

“The damage is already done for the 45 workers who endured weeks of unnecessary stress, not knowing if they would be able to pay bills or support their families.”

Finance Sector Union, reported by Information Age, The Nightly and HRD Australia [28][29][30]. The union called the reversal “a massive win for workers”.

15 OCTOBER 2025 · ANNUAL GENERAL MEETING

“We made a mistake.”

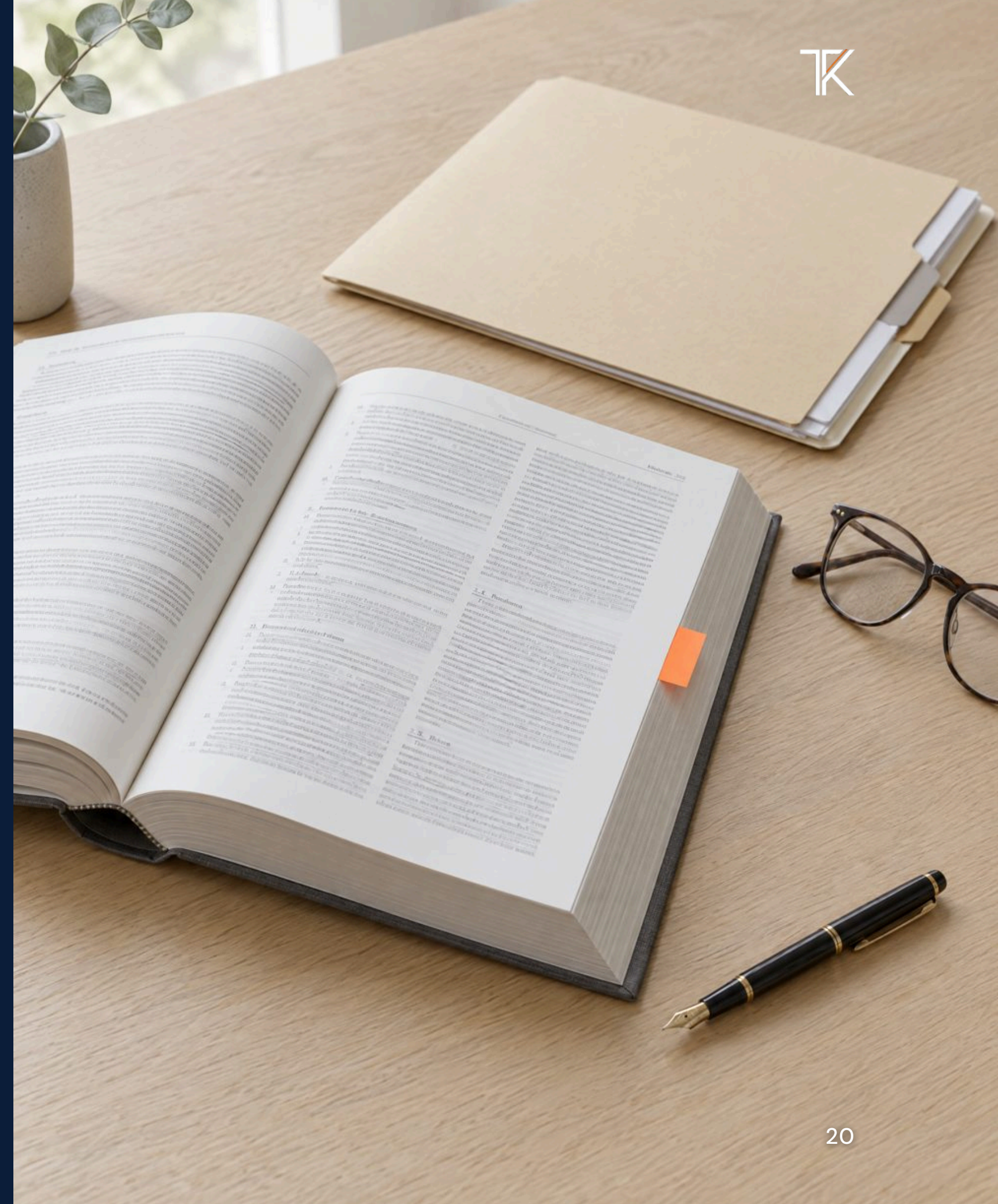
Paul O'Malley, Chair, answering a former employee from the floor [31]

- The full answer: “We didn’t adequately consider all the relevant business considerations.” [31]
- The shareholders’ association recorded that the CEO, Matt Comyn, also apologised [22]
- Neither prepared address mentioned the case [3][4]

PART 3

The law and the record.

Why “not redundant” matters under the Fair Work Act.



FAIR WORK ACT 2009, SECTION 389

A genuine redundancy has to pass three tests.

TEST 1

The job is no longer required to be performed by anyone, because of operational change

TEST 2

The employer has met its obligations to consult

TEST 3

Redeploying the person would not have been reasonable

CBA, 21 AUGUST 2025

“this error meant the roles were not redundant”

Sources: Fair Work Commission, What is a genuine redundancy? [16]; CBA statement [26]. Reading CBA’s wording against the first test is my analysis; CBA did not refer to the Act.

MY READING

A technology claim that could not be shown in data became a legal weakness.

IF CALLS WERE RISING

The jobs were still needed.

Whatever the bot was doing, a role is redundant only if nobody needs to do the job. Rising volumes, overtime and team leaders on the phones point the other way [11] [16].

WITH NO PUBLISHED DATA

There was nothing to defend.

The case for the cuts rested on one number given in a briefing. That explains why the bank chose to concede rather than defend the decision at a hearing [24][26].

My analysis of the Fair Work Commission's guidance [16] against CBA's statement [26]. CBA did not draw this link.

A SEPARATE DISPUTE

The offshoring complaint followed its own track.

July 2025

CBA rejected the union's offshoring claims: "We refute their claims." [40]

October 2025

The union said a review directed by the Commission found **two** Australian roles had gone offshore, and that CBA withdrew **30** job advertisements in India [14].

Often confused

That review concerned offshoring. It is often reported as part of the voice bot case, but it belongs to the offshoring dispute [14].

Sources: HRD Australia, 18 July 2025 [40]; Finance Sector Union, 2 October 2025 [14].

PART 4

What CBA did next.

2026: a funded programme, further cuts and a different way of talking about AI.

AFTER THE REVERSAL

CBA kept changing its workforce, and changed how it explained it.



CBA also appointed a Chief AI Officer in November 2025 [5]. Sources: CBA, 24 February 2026 [6]; Finance Sector Union [15]; Information Age [34][43]; Retail Banker International [42]; HRD Australia [35][39]; iTnews [36]; Capital Brief on Bloomberg [38].

FULL-TIME EQUIVALENT STAFF AT 30 JUNE

CBA India grew by about 1,300 staff in two years.



Source: CBA 2026 Annual Report, five-year summary table [7]. Headcount moves for many reasons; these figures cannot show what AI did to jobs. They do show why the union treated automation and offshoring as one story.

ATTRIBUTION

CBA changed how it attributed role cuts between 2025 and 2026.

JULY 2025

45 roles “affected by” the voice bot. Automating simple queries frees teams for complex ones [23][24].

FEBRUARY 2026

About 300 roles cut. AI “is changing how some tasks are performed but it is not the driver of these role changes” [15][34].

Naming AI as the cause of job losses invites scrutiny from unions, the press and shareholders. The bank learned that in public.

MAY 2026 · MATT COMYN, CEO

“An employer of our scale has a responsibility to avoid false reassurance and give people the best possible chance to adapt.”

“Pretending every role can be preserved would not be fair either.”

Reported by HRD Australia, 26 May 2026 [35]

FEBRUARY 2026

A \$90 million, three-year Future Workforce Program.

90m

Australian dollars over three years, launched 24 February 2026 [6].

WHAT CBA SAID

Organisations had traditionally made changes and then engaged with workers after the fact. The bank had worked with unions to design the programme [6].

WHAT THE UNION SAID

The programme must support displaced workers. About 300 roles were cut the same day [15].

PART 5

The rules around the decision.

Parliament, unions, the National AI Plan and the prudential regulator.

POLICY

Australian policy has been moving toward consulting workers on AI.



Sources: Senate Select Committee on Adopting AI, final report [17]; ACTU releases [19][20]; University of Sydney [21]; Baker McKenzie [37][41]. No AI-specific workplace law exists as of October 2026.

APRA's operational risk standard took effect weeks after the bot went live.

CPS 230, from 1 July 2025

Requires banks to manage the operational risk of changes to critical operations and of material service providers [18].

Where a contact channel now sits

A customer channel run partly by bots and partly by outsourcers falls squarely in that scope. Nothing links CPS 230 to this case; the application is my reading.

PART 6

Why it matters for AI.

Three lessons: triage, evidence and attribution.



LESSON ONE · TRIAGE

A triage bot changes where work lands.

WHAT EARLY DATA SHOWS

Fewer calls reaching staff

A few weeks after go-live, the bot closes simple queries.



WHAT CAN FOLLOW OVER MONTHS

- Callers reach a person later and more frustrated
- The calls that remain are harder
- Volumes keep rising for other reasons
- Overtime and team leaders fill the gap

The bot was described as a triage tool that passed calls to staff [23]. The union says management admitted it missed the continuing rise in calls [12]. This mechanism is a general reading, not a measurement of CBA's bot.

LESSON TWO · EVIDENCE

The case for the cuts rested on a single number in a briefing.

WHAT HAPPENED

2,000 calls a week.

Given to the union, never published. When it was challenged there was nothing to defend it with, and CBA put the reversal down to an assessment that had not looked at everything it should have [24][11][26].

WHAT A BOARD SHOULD SEE

The measurement first.

A board approving headcount changes on the strength of an AI deployment should expect the data, the period it covers and who checked it, before the decision.

RULE OF THUMB

No measurement, no headcount decision.

LESSON THREE · ATTRIBUTION

Naming AI as the cause of job losses invites a particular kind of scrutiny.

Unions

The Finance Sector Union disputed the cuts within nine days and asked for the data [11].

The press

Headlines called it a chatbot and later a rehiring. Both overstate the record [25][29][26].

Shareholders

A former employee asked the question at the AGM, and the Chair answered it [31][22].

CBA has since reached for a different model: a funded workforce programme designed with unions, and a CEO who speaks openly about the jobs at stake [6][35].

REPORTING

Six things that are often misreported.

Voice bot	It was a voice bot on the phone line. Several headlines called it a chatbot [25][29].
45 roles	The reversed roles were 45 call-centre roles. The union's 90 included messaging roles that were not reinstated, as far as the record shows [9][26].
2,000 calls	What CBA told the union. It is not a published measurement [24][11].
No rehiring	Staff were told their roles were redundant, then offered their jobs back three weeks later. Stories of a mass rehiring overstate it [26].
No ruling	No tribunal ruled on the voice bot. The review that found offshored roles belongs to the offshoring dispute [12][14].
No causation	CBA said call volumes rose and its assessment missed it. No source shows the bot caused the rise [26][27].

EVIDENCE & METHODOLOGY

Each claim graded by what it rests on.

Claim	Source	Grade
45 roles in Customer Service Direct were affected by the voice bot	CBA statements of 29 July and 21 August 2025, via iTnews and Digital Nation	Company statement
The bot cut calls by 2,000 a week	CBA briefing to the union, via the union and Yahoo Finance. In no CBA document.	Unverified company claim
Call volumes were rising; overtime offered; team leaders on the phones	Finance Sector Union, 7 August 2025	Union account, not contested in public
The roles were not redundant and CBA apologised	CBA statement, 21 August 2025, full text via Digital Nation	Company statement
The Chair said "We made a mistake"	AAP report of the 15 October 2025 AGM; not in the prepared address	Single press report, consistent with shareholders' association
No tribunal ruled on the voice bot	Union releases of 21 August 2025; no Commission decision found	Absence of record
Staff numbers in Australia and India, 2024 to 2026	2026 Annual Report, five-year summary table	Measured, company figures
CBA cut more than 1,000 jobs in 2026	Finance Sector Union count, via Information Age, 24 September 2026	Union figure, not confirmed by CBA
More than 500 people whose roles were cut in 2026 moved into other CBA roles	CBA spokesperson, via Information Age, 24 September 2026	Company statement
The "not redundant" wording matches the first	Mv reading of the Commission's guidance against CBA's	

PART 7

Lessons and controls.

Eight lessons for boards, then a checklist you can use on your own rollout.

Get the evidence right before the decision.

01 Measure for long enough before cutting.

The roles were declared redundant within about two months of go-live. Set a measurement period that covers seasonal and follow-on demand, and make headcount decisions after it ends.

02 Publish the number you rely on, at least internally.

The 2,000-calls claim was never shown, so it could not be defended. Any headcount case built on an AI system's effect should carry the data, the period and who checked it.

03 Count the work the bot hands back.

A triage bot moves work to people as well as removing it. Track transfers, repeat calls, handling time and overtime alongside the calls the bot closes.

04 Test the redundancy separately from the business case.

A role is redundant only if nobody needs to do the job. Ask HR and legal to test each role against that standard, and against redeployment, before any announcement.

Run the change so it can be corrected.

05 Consult before the decision.

The union says CBA would not share its data or how it chose the roles. Bring staff and their representatives into the measurement, so the evidence is agreed before it is used.

06 Explain automation and offshoring decisions separately.

Announcing them together let each discredit the other. If both are happening, explain each on its own evidence.

07 Include outsourced and offshore roles in the same view.

The later reports concerned contractors in another country. A board should see the whole channel's workforce, not only direct employees, when it reviews an AI rollout.

08 Make reversal possible.

CBA could undo the decision because the people were still there. Sequence changes so that a wrong assessment can be corrected before anyone has left.

APPLYING IT

Actions for boards, executives and government.

BOARDS**Ask for the measurement.**

The data, the period and who checked it

The whole channel's workforce, including outsourced and offshore

Proof that the decision can still be reversed

EXECUTIVES**Test the roles, not just the case.**

Each role against "nobody needs to do the job", and against redeployment

Transfers, repeat calls, handling time and overtime tracked

Automation and offshoring explained separately

GOVERNMENT**Consult before deciding.**

The Senate committee treats AI affecting people at work as high-risk [17]

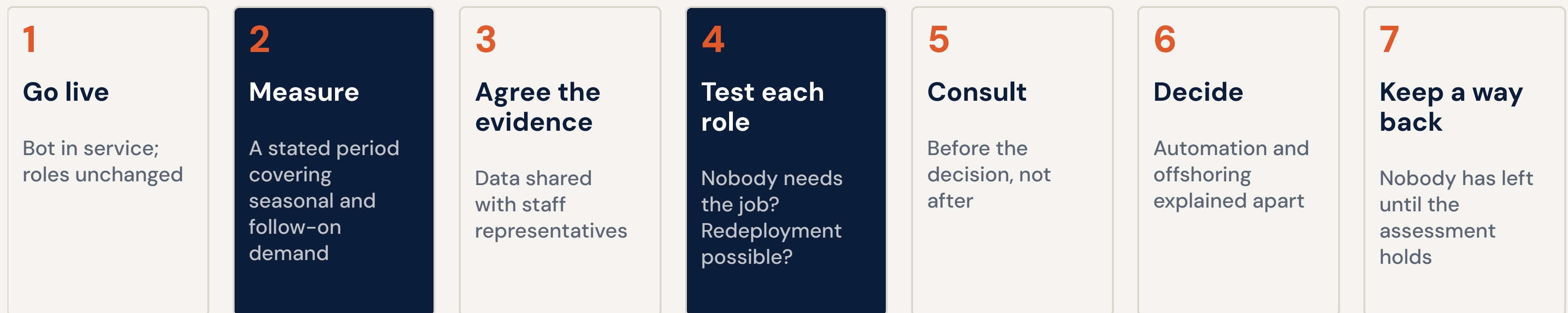
Unions seek enforceable implementation agreements [19]

Hold public contact centres to the same standard

Drawn from the eight lessons; the government column also draws on the Senate committee [17] and the ACTU [19].

A SEQUENCE FOR AI-LINKED WORKFORCE CHANGE

Seven steps between go-live and a headcount decision.



My sequence, built from the eight lessons. CBA's roles were declared redundant within about two months of go-live, and steps 2 to 5 are where the record shows gaps [23][11][26].

WORKFORCE-TRANSITION CONTROLS

A checklist for any AI rollout that touches roles.

Stage	Control	Evidence to keep
Before go-live	Baseline call volumes, transfers, repeat calls, handling time and overtime	Signed-off baseline report
Before go-live	Name the channel's whole workforce: direct, outsourced and offshore	Workforce map for the channel
Measurement	Set the period in advance, long enough for seasonal and follow-on demand	Measurement plan with end date
Measurement	Share the data with staff representatives as it comes in	Consultation log
Before the decision	Independent check of the headline number the case relies on	Reviewer sign-off on the figure
Before the decision	HR and legal test each role: still needed by anyone? redeployable?	Role-by-role test record
Announcement	Explain automation and offshoring decisions separately	Separate rationales
After the decision	Keep people in role until the assessment has held for a stated time	Reversal trigger and owner

My checklist, drawn from the lessons of this case. To size the human review a customer-channel AI needs, use the oversight ceiling calculator and the agent risk assessment matrix at terencekok.com/resources.

FOR DISCUSSION

Questions to take back to your organisation.

- 1 Which AI deployment in your organisation has a headcount number attached, and who has seen the data behind it?
- 2 How long does your organisation measure an AI system's effect before it acts on roles?
- 3 Would your redundancy test survive the question "does anyone still need to do this job?"
- 4 Do your board papers show outsourced and offshore roles in the same view as direct staff?
- 5 If an assessment proved wrong three weeks later, could you put it right before anyone had left?

AS OF 12 OCTOBER 2026

What to watch next.

The 2026 AGM

Scheduled for 14 October 2026 in Sydney. The Chair's notice says the board has monitored investment in priority AI use cases [44].

The enterprise agreement

Under negotiation. The union wants changes to the redundancy process and a commitment to retrain local staff [43].

AI legislation

Promised for early 2027. Announced standards cover data centres and AI training; workplace rules are still at consultation [21][41].

The 45 staff

CBA has not published how many stayed, moved or left, or the call data behind its assessment [26].

Full timeline, Jun 2024 to 7 Aug 2025.

When	Event	Sources
Jun 2024	The union says CBA will make 158 roles redundant in Customer Service Direct and move the people into broader roles.	[8]
Sep 2024	CBA trials Hey CommBank, a text-based AI chat tool. It has more than 2,400 call-centre staff handling about 50,000 contacts a day.	[33]
Nov 2024	The Senate committee on adopting AI recommends treating AI that affects the rights of people at work as high-risk, and consulting workers.	[17]
Mar 2025	CBA expands its partnership with Anthropic and invests in the company.	[1]
Jun 2025	A voice bot goes live on the inbound customer enquiries line. APRA's operational risk standard CPS 230 takes effect on 1 July.	[23][18]
29 Jul 2025	CBA confirms 45 roles are affected by the voice bot. The union puts the total cut at 90, including messaging roles it says are moving to CBA India. The ACTU calls for enforceable AI implementation agreements the same day.	[9][23] [19]
7 Aug 2025	The union says it is disputing the cuts at the Fair Work Commission and that CBA has not backed the 2,000-calls claim with data.	[11]

Full timeline, 13 Aug 2025 to Feb 2026.

When	Event	Sources
13 Aug 2025	CBA announces a strategic partnership with OpenAI.	[2]
21 Aug 2025	CBA says the roles were not redundant, apologises and offers each person a choice to stay, be redeployed or leave.	[26][27] [12]
2 Oct 2025	In the separate offshoring dispute, the union says a review directed by the Commission found two roles had gone offshore and CBA withdrew 30 job ads in India.	[14]
15 Oct 2025	At the AGM the Chair says "We made a mistake". The shareholders' association records that the CEO apologised.	[31][22]
Nov 2025	CBA appoints a Chief AI Officer.	[5]
Dec 2025	The National AI Plan is released; the ACTU says it commits to meaningful consultation with workers.	[20]
Feb 2026	A \$90m Future Workforce Program. About 300 roles cut the same day; CBA says AI is not the driver.	[6][15] [34]

Full timeline, Apr 2026 to Sep 2026.

When	Event	Sources
Apr 2026	The union says 119 more roles will go, six of them linked to automation.	[42]
May 2026	The CEO warns against "false reassurance" about AI and jobs.	[35]
Jul 2026	276 roles proposed for cuts. The Prime Minister promises AI legislation "early next year". Bloomberg reports outsourced chat roles replaced by AI.	[36][21] [38]
Aug 2026	The 2026 Annual Report: 37,006 staff in Australia and 6,935 in India, full-time equivalent. Lawyers read the Government's AI plan as standards for data centres and AI training, with workplace adoption left to consultation.	[7][41]
Sep 2026	The union says more than 172 technology roles will go and puts CBA's 2026 cuts at more than 1,000. CBA does not cite AI. The Notice of Meeting sets the AGM for 14 October 2026.	[43][44]

COMMONWEALTH BANK VOICE BOT · CASE STUDY

Questions and discussion.

Thank you.

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