AXIOMATIC

Information letter and model consent request

Inora, for the works council. WOR article 27(1)(k) and (l).

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This document holds two parts, each on a new page:

1. **The information letter to the works council**: what Inora is, which rules on staff data are built into the system and which clauses bind them.
2. **The model consent request**: the proposed decision the board puts to the works council in writing (WOR article 27(2)), with the conditions on which the council consents before the rollout to more teams after the pilot and before Inora Matrix becomes the official competence register.

Fill in the text between square brackets. Adapt what is different in your organisation; leave the conditions in article 4 of the request as they are, because the consent rests on them.

1. The information letter

[Name of the organisation]
To the works council
[Place], [date]

Subject: information with the request for consent to the introduction of Inora

Dear members of the works council,

We will shortly ask for your consent to the introduction of Inora. Before you decide, this letter gives you everything you need: what Inora is, what it does and does not do with staff data, and in which document each rule stands. You need take nothing on our word.

What Inora is

Inora is our organisation's knowledge system, built on our own knowledge. A care worker asks a question in plain language, at the bedside or in the car, and gets an answer from our own protocols, work agreements and guidelines, with the source attached. Inora readies the report in our own format; the care worker reads and signs, and only on that approval does Inora file it in the client record; Inora acts on that person's behalf, never with more rights than they have. The care worker checks the answer against its source and decides.

That takes three steps out of the shift: finding out how it is done here, doing it and logging it, and writing it up. That work now often happens after the shift.

Inora is made by Axiomatic B.V. in Delft. It is built to NEN 7510 and ISO 27001. Data stays in the European Union, or on our own servers, and no model trains on it. Staff sign in with their own account of our organisation with two-step verification.

Why you have the right of consent

Inora processes staff data: their account, their questions and the answers they received. A scheme for the processing and protection of staff personal data (WOR article 27(1)(k)) and a scheme for facilities suited to observing or checking staff attendance, conduct or performance (under (l)) need your consent. That holds for every system that records data about work, even when it is not meant to watch anyone. You are right to ask.

The line: what goes to the organisation about a member of staff, and what never does

Inora is built around one rule: nothing about an individual care worker goes to the organisation, except what they send themselves and the competence record. What a care worker asks Inora never reaches the organisation. Only what the care worker sends reaches it, such as a report or an incident report, and the competence record the inspectorate expects (Wkkgz, Wet BIG). That line is not a setting an administrator can change; it is in the system.

What never goes to the organisation

- **What the care worker asks and reads.** No one in the organisation reads a conversation, management included. No administrator, manager or board member can open a member of staff's questions and answers.
- **How often, how fast and when the care worker works.** No one in the organisation gets a figure about one member of staff. Figures on use cover only teams of at least five people.

- **A judgement of the care worker's work.** Inora assesses no one and gives no one a score.
- **The care worker's mood.** Inora infers no emotions or mood, from voice or face. The AI Act prohibits that (article 5(1)(f)).
- **What Axiomatic reads on request.** Axiomatic reads a conversation only on a written request from the function we name for it, such as the data protection officer, for an incident or a complaint; every access is logged and the member of staff is told. In an outage or security incident Axiomatic examines the system logs and the answer record, never a conversation. Whoever made the request gets a finding about Inora, never what the member of staff asked or read. If the law demands a conversation, Axiomatic gives only what the demand asks, logs it, and the member of staff is told, unless the law forbids it.

What does go to the organisation, and why that protects staff

- **The monthly report per team.** Per team of at least five people: what was asked about, which topics found no answer yet, with a count, which gaps in the work agreements were closed and how much time Inora gave the team back. No name, no question as someone typed it, no figure per person, no score. The topic is set together with the answer, without names; no person reads along. Per team to the team lead and the works council; the board and quality receive the sum across all teams. A team of fewer than five gets no report of its own.
- **A question with no answer, as a topic.** When the answer is not in our sources, whoever owns the subject receives the topic, rewritten without identifying detail and without the asker's words, with the number of times it was asked, pooled per protocol and summed across all teams, so the source gets completed. The name of whoever asked does not go with it. A topic asked once goes in only when it comes a second time; after three months it goes only into the sum across all teams.
- **A wrong answer, as a finding about the system.** If a member of staff comes across a wrong answer, that is a finding about Inora and the source. No finding names whoever came across the failure.

- **The competence record.** Whoever performs a reserved procedure on the instruction of an independently authorised professional, such as a doctor, must be competent to do so and follows their directions (Wet BIG, articles 35 and 38), and the inspectorate expects us to show that competence, for high-risk procedures too. Inora Matrix is our competence register for it: per role it lists the procedures our training policy asks for, the assessor signs off the practical assessment, and from then on the record stays current with the procedures the member of staff reports doing themselves, with the protocol and the version that applied. The care worker's questions to Inora never count, not even as evidence of competence. It is our own record; Axiomatic keeps it in Inora as processor. It records only the procedure, the protocol with its version, the date, on whose instruction and who signed off the practical assessment, never the content of a conversation, a score or a usage figure. In the pilot it is a preview for the participating team and staff take part voluntarily; it becomes our official register only after your consent. Only our team lead and training department see the competence record, and the member of staff themselves. The member of staff sees their own competence record in Inora and receives a copy on request (article 15 GDPR).

What is kept, and for how long

Data	What for	How long, and what we receive
Documents: names and functions of staff as author or owner	Shown as source	As long as the document stays in Inora
Account: name, work e-mail address, unique code and groups from our identity provider	So that only authorised staff have access	As long as the member of staff has access, and 30 days after
Conversations: questions, answers and drafted reports, and the topic of each conversation, without names	So the member of staff finds their own conversation again, and the topic for the monthly report per team	90 days by default; we set the period. No one in our organisation opens them. If we ask Axiomatic, within the retention term, to read a conversation for an incident or a complaint, Axiomatic holds it until the investigation is complete and deletes it within 30 days after; the member of staff is told
Logs: sign-ins, administrative actions and every access by Axiomatic	Keeping the service secure	12 months. On request we receive the logs only totalled per team of at least five people and per day; a day with fewer than five sign-ins shows as '<5'; one member of staff's sign-in times and IP addresses never

Data	What for	How long, and what we receive
Service metrics: numbers of questions and response times per user	Only to run the environment	Per user 30 days, then only totalled per team of at least five people; never per member of staff to us
Test set: questions from our organisation and flagged answers with their question, without names	Only on our written instruction, after your consent, to test new versions; no person reads a question or answer for it	Until we withdraw the instruction, at the latest until the end of the agreement; then gone within 30 days
Competence record: the procedure, the protocol with its version, the date, on whose instruction and who signed off the practical assessment; never the content of a conversation, a score or a usage figure	The record the inspectorate expects of us (Wkkgz, Wet BIG)	In Inora for as long as the member of staff works for us, plus 30 days; in those 30 days we export it to our own personnel file, where our own term applies
Answer record: per answer the sources with their versions, the check it passed and the date, and a reference the member of staff sees with the answer; never who asked, the time, the ward, the question or the answer	Accounting for what an answer rested on, for an incident or a complaint	2 years, at Axiomatic. We receive it only on written request, never who asked

Apart from the competence record and what the member of staff sends themselves, we receive nothing per member of staff from any of these data. After the agreement ends, everything is deleted from active systems within 30 days and from backups within 60 days, and on request Axiomatic confirms that in writing.

Where each rule stands

Rule	Where it stands
No one in the organisation reads a conversation	Data processing agreement, art. 5.5; Privacy statement, Staff conversations
No one in the organisation gets a figure about one member of staff	Inora and the EU AI Act, What Inora never does.6
No one gets a score	Inora and the EU AI Act, What Inora never does; Privacy statement, Staff conversations

Rule	Where it stands
No emotion recognition	Data processing agreement, art. 5.6; Inora and the EU AI Act, What Inora never does; AI Act, art. 5(1)(f)
Axiomatic reads a conversation only on a written request, never in an outage; the member of staff is told of a legal demand	Data processing agreement, art. 5.4, 5.5 and 5.6; Privacy statement, Staff conversations
Reports only per team of five or more, per team to the team lead and the works council	Data processing agreement, art. 5.6; Privacy statement, Staff conversations
A question with no answer goes as a topic, without a name and without the asker's words	Data processing agreement, art. 5.6; Privacy statement, Staff conversations
A failure is a finding about the system	Data processing agreement, art. 5.6; Trust, When something goes wrong; this request, condition 8
What a care worker asks never reaches the organisation; by name only the competence record	Data processing agreement, art. 5.6; Privacy statement, Staff conversations; this request, condition 9
The time that comes back goes to care	This request, condition 10
Test set only with your consent	Data processing agreement, art. 3.8; this request, condition 11

The pages are at axiomatic.digital/en/trust; we enclose the data processing agreement with Axiomatic.

What we ask of you

We put the request on the next page to you in writing, with the reasons and the consequences for staff. We will discuss it with you at the consultation meeting of [date of the meeting], before the rollout to more teams after the pilot; without your consent no other team follows and Inora Matrix does not become the official competence register. You then decide, and let us know your decision in writing and with reasons (WOR article 27(2)). If you have questions beforehand, we or Axiomatic will answer them, at your meeting or on paper.

Kind regards,

[Name]
[Function]

2. The model consent request

[Name of the organisation], the board
To the works council of [name of the organisation]
[Place], [date]

Subject: request for consent to the introduction of Inora (WOR article 27(1)(k) and (l))

Dear members of the works council,

Under article 27 of the Works Councils Act we ask for your consent to the proposed decision below.

Article 1. The proposed decision. We introduce Inora, starting with an eight-week pilot in [name of the team], from [start date] to [end date]. Taking part in the pilot is voluntary; during the pilot Inora Matrix is a preview for the pilot team. Until you have consented, no other team works with Inora and Inora Matrix does not become the official competence register. After the pilot we decide which teams follow. This decision contains the scheme for the processing and protection of staff personal data in Inora, with the conditions in article 4.

Article 2. The reasons. Care workers look up how it is done here, log what they did and write it up, often after their shift. Inora takes those three steps over, with answers from our own protocols and the source attached. Inora readies the report; the care worker reads and signs, and only on that approval does Inora file it in the client record; Inora acts on that person's behalf, never with more rights than they have. We want to bring administration time down, make the current work agreement reachable at any moment, at night too, and give the time back to the client.

Article 3. The consequences for staff. Staff in the teams that work with Inora sign in with their own account. They ask questions in plain language and check the answer against its source; they decide. No one is required to ask Inora instead of a colleague. Staff receive training at the start. The pilot measures the effect per team, never per person.

Article 4. The conditions. We introduce Inora only on these conditions:

1. No one in the organisation reads a member of staff's conversation with Inora, management included.
2. No one in the organisation gets a figure about one member of staff: not how often, how fast or when they work.
3. Inora assesses no one and gives no one a score.

4. Inora infers no emotions or mood.
5. Axiomatic reads a conversation only on a written request from [function, for example the data protection officer], for an incident or a complaint; every access is logged and the member of staff is told. In an outage or security incident Axiomatic examines the system logs and the answer record, never a conversation. Whoever made the request gets a finding about Inora, never what the member of staff asked or read. If the law demands a conversation, Axiomatic gives only what the demand asks, logs it, and the member of staff is told, unless the law forbids it.
6. Reports cover teams of at least five people: per team to the team lead and the works council; the board and quality receive the sum across all teams. A smaller team gets no report of its own. The topic is set together with the answer, without names; no person reads along.
7. A question with no answer goes as a topic, without a name and without the asker's words, to the subject's owner. A topic asked once goes in only when it comes a second time; after three months it goes only into the sum across all teams.
8. A wrong answer is a finding about Inora and the source, never about the member of staff who came across it.
9. What a care worker asks Inora never reaches the organisation. Only what the care worker sends reaches it, such as a report or an incident report, and the competence record the inspectorate expects (Wkkgz, Wet BIG). That record is our competence register for reserved and high-risk procedures under our training policy: the assessor signs off the practical assessment, and from then on it stays current with the procedures the member of staff reports doing themselves, with the protocol and the version that applied. The care worker's questions to Inora never count, not even as evidence of competence. It records the procedure, the protocol with its version, the date, on whose instruction and who signed off the practical assessment, never the content of a conversation, a score or a usage figure. In the pilot the record is a preview for the participating team and staff take part voluntarily; it becomes our official register only after your consent. It stays in Inora for as long as the member of staff works for us, plus 30 days; in those 30 days we export it to our own personnel file. Only our team lead and training department see the competence record, and the member of staff themselves. The member of staff sees their own competence record in Inora and receives a copy on request. The record log shows, once Inora reads the record, through a connection or the user's own login, per step what Inora did and on whose behalf. The function the organisation appoints sees it only on written request, per client or in an investigation, to check record access; it is no figure about a member of staff and never holds what anyone asks.
10. The time Inora gives back goes to care. A decision on staffing is a decision of its own, which we put to you separately.

11. We switch on the test set only if you consent to it separately below. No person reads a question or answer in the test set; testing a new version is automated. If you withdraw the consent for the test set, Axiomatic deletes the test set within 30 days.

Conditions 1 to 9 and 11 also stand in the data processing agreement with Axiomatic, Axiomatic's privacy statement (Staff conversations) and the page Inora and the EU AI Act (What Inora never does). Condition 10 is an agreement within our organisation and stands in this decision only. Axiomatic weakens no condition without our written consent.

Article 5. Evaluation. We evaluate the introduction with you after the eight-week pilot and every year after. For that you receive the monthly report per team and an overview of every access by Axiomatic (article 4, condition 5), without its content.

Article 6. Change. If we want to change these conditions, or deploy Inora for another purpose, we put that to you as a new request for consent. If we use Inora other than on these conditions, that is a decision without your consent. You can then invoke its nullity in writing, within one month of our telling you of that use or of it becoming apparent to you (WOR article 27(5)), and we stop that use.

Article 7. Our request. We ask you to consent to this decision, on the conditions in article 4. We would welcome discussing it with you at the consultation meeting of [date of the meeting], before the rollout to more teams after the pilot. After your decision we let you know in writing which decision we take and the date it takes effect.

Kind regards,

[Name], for the board of [name of the organisation]

Signature: _____

Decision of the works council

To be filled in by the works council.

Field	Entry
Discussed at the consultation meeting of	
Decision on the request	Consent / no consent
Test set (condition 11)	Consent / no consent
Reasons	

Field	Entry
Date and signature of the chair	