AXIOMATIC

Pack for the works council

Inora and staff data. What goes to the organisation, what never does, and where it stands.

Version 1.9, 11 November 2026

This pack is for the members and the secretary of the works council of a care organisation that intends to introduce Inora. It answers one question: do our staff's conversations stay private? Yes, your staff's conversations stay private. Below is how, what does go to the organisation, and in which document each rule stands, so the council consents on terms, not promises.

The consent request itself, with the information letter, is a separate document: *Information letter and model consent request*, version 1.7 of 7 November 2026.

1. What Inora is

Inora is the care organisation's knowledge system, built on its own knowledge. They ask a question in plain language and get an answer from the organisation's own protocols, work agreements and guidelines, with the source attached. Inora readies the report in the organisation's 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 professional checks 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.

Inora is made by Axiomatic B.V. in Delft and built to NEN 7510 and ISO 27001. Data stays in the EU or on the organisation's own servers; no model trains on it. Staff sign in with their own organisation's account, through single sign-on.

2. Why the council has the right of consent

Article 27(1) of the Works Councils Act (WOR) gives the works council the right of consent over:

- **under (k):** a scheme for the processing and protection of the personal data of the people working in the enterprise;
- **under (l):** a scheme for facilities aimed at or suited to observing or checking the attendance, conduct or performance of the people working in the enterprise.

Inora processes staff data and records work, so both apply. The board puts the decision in writing, with the reasons and the consequences for staff; the council decides only after at least one consultation meeting and gives its decision in writing, with reasons (article 27(2)). A decision taken without consent is null if the council invokes that in writing, within one month of the board telling it that it is carrying the decision out, or of that becoming apparent to the council (article 27(5)).

Source: Works Councils Act, article 27 (Dutch).

3. The line

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; it is in Inora, and no administrator, manager or board member can change it.

	What Inora knows about a care worker's work	What the line does with it
Rule 1	The care worker's conversations	Stops. No one in the organisation opens their conversations, management included.
Rule 2	How often, how fast and when the care worker works	Stops. No figure about one member of staff, for anyone in the organisation.
Rule 3	A judgement of the care worker's work	Stops. Inora assesses no one and gives no one a score.
Rule 4	The care worker's mood	Stops. Inora infers no emotions, from voice or face.

	What Inora knows about a care worker's work	What the line does with it
Rule 5	What Axiomatic reads on request	Stops. Axiomatic reads a conversation only on a written request from the function the organisation names, 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.
Rule 6	What the care worker's team asks about	Crosses, per team of five or more: the monthly report, without a single name. Per team to the team lead and the works council; the board and quality receive the sum across all teams.
Rule 7	A question with no answer	Crosses. A question with no answer goes as a topic, without a name and without the asker's words, to the owner, pooled per protocol, so the source gets completed.
Rule 8	A wrong answer	Crosses, as a finding about Inora and the source, never about whoever came across it.
Rule 9	A reserved or high-risk procedure	Crosses, by name: the competence record, with the procedure, the protocol with its version, the date and on whose instruction. The care worker sees it themselves in Inora.

Outside the line, because the organisation switches it on itself and only if the council consents (condition 11):

- **Test set.** Questions from the organisation and flagged answers with their question, without names, to test every new version of Inora; no person reads a question or answer for it. Only on the organisation's written instruction, after the works council's consent.

4. What management sees: the monthly report per team

Per team to the team lead and the works council; the board and quality receive the sum across all teams. The topic is set together with the answer, without names; no person reads along. Per team of at least five people the monthly report holds:

- what was asked about, per subject, with the team's count together;
- which topics found no answer yet, with a count, as their owner receives them: rewritten without identifying detail, without a name and without the asker's words, pooled per protocol. 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;
- which gaps in the work agreements were closed;
- how much time Inora gave the team back.

It never holds: a name, a question as someone typed it, a figure per person, one member of staff's times or pace, a score. A team of fewer than five people gets no report of its own, so no one in it can be recognised.

Example, Zorggroep Voorbeeld, Heuvelland-Oost district team (11 members of staff), October 2026

Part	Content
What the team asked about	Wound care 41, Medication 33, Reporting 28, Catheter care 17, Other subjects 24 (143 questions)
No answer yet	4: Insulin pen: shelf life outside the fridge · 2× (to medication policy); Replacing a urinary catheter: who may do it · 2× (to reserved procedures). Without a name and without the asker's words
Gaps closed	2 work agreements completed
Time given back	14 hours, for the whole team
Heuvelland night shift (4 members of staff)	No report of its own

The figures are the example's; an organisation's real report is confidential.

5. 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). A subcutaneous insulin injection and inserting a catheter are such procedures. The inspectorate expects the organisation to show that competence, for high-risk procedures too. Today that is often kept on paper or in a training system, and often after the fact.

That competence record, besides what the care worker sends themselves the only thing by name that goes to the organisation (section 3), covers reserved and high-risk procedures under the organisation's training policy. It is the organisation's own record; Axiomatic keeps it in Inora as processor, on its instruction. Inora records it from what the care worker did; what they asked or read does not go with it. It records only the procedure, the protocol with its version, the date and on whose instruction, never the content of a conversation, a score or a usage figure. Inora Matrix is the organisation's competence register for it: per role it lists the procedures the training policy asks for, the assessor signs off the practical assessment in the same report flow, and from then on the register 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. In the pilot it is a preview for the participating team and staff take part voluntarily; it becomes the official register only after the works council consents.

An example.

Field	Content
Care worker	Sanne de Wit, senior care assistant
Procedure	Subcutaneous insulin injection, a reserved procedure
Protocol	Insulin administration, version 6
Date	14 October 2026
On whose instruction	The client's attending physician

Goes to the organisation	Never goes there
Who, which procedure and which protocol, with its version	What she asked or read
The date, and on whose instruction	How often she uses Inora
	How long she took
	A score or a judgement

Retention. In Inora for as long as the care worker works for the organisation, plus 30 days; in those 30 days the organisation exports it to its own personnel file, where its own term applies.

Who sees it. The care worker themselves: their own competence record, always, in Inora. They can ask for a copy to take with them: that is their right of access (article 15 GDPR), which the organisation answers and Axiomatic helps with. The team lead and training: the competence

record, to know who may perform which procedure; they had to know that already. No one else.

Why it serves the care worker. Their competence is recorded at the moment itself, not afterwards, with the protocol and the version in force, and they see for themselves what it says about them. Proof of their craft, not a yardstick.

Source: Wet BIG, articles 35 and 38 (Dutch).

6. The rules in writing

Each rule of the line stands word for word in a document the council can cite in its decision. The board receives the data processing agreement with Axiomatic's proposal; the council asks the board for it.

Rule 1. No one in the organisation reads a care worker's conversation.

- Data processing agreement, art. 5.5: "No administrator, manager or board member of the Controller can open a member of staff's conversations in Inora."
- Privacy statement, Staff conversations: "No one in the organisation reads a conversation, management included."

Rule 2. No one in the organisation gets a figure about one member of staff.

- Inora and the EU AI Act, What Inora never does: "Figures on use cover only teams of at least five people, never one member of staff, and no one gets a score."
- Data processing agreement, art. 3.4: "The Controller instructs the Processor to use Service Metrics only to operate its Environment and resolve problems within it."
- Data processing agreement, art. 5.6: "The Processor gives the Controller no figure, score or assessment about a single worker and none of the content of their conversations."

Rule 3. Inora assesses no one.

- Inora and the EU AI Act, What Inora never does: "It does not evaluate staff or take decisions about their work."
- Privacy statement, Staff conversations: "Inora assesses no one and gives no one a score."

Rule 4. No emotion recognition.

- Data processing agreement, art. 5.6: “Inora infers no emotions or mood of a member of staff (AI Act, Article 5(1)(f)).”
- Inora and the EU AI Act, What Inora never does: “It infers no emotions or mood of staff, from voice or face. Article 5(1)(f) prohibits that.”

Rule 5. Axiomatic reads a conversation only on a written request, for an incident or a complaint, and never in an outage; the requester gets a finding about Inora, never what the member of staff asked. The member of staff is told of a legal demand, unless the law forbids it.

- Data processing agreement, art. 5.5: “The Processor reads a conversation between a member of the Controller’s staff and Inora only on a written request from the function the Controller names for it in Annex 3, such as its data protection officer, and for the purpose the request states: an incident or a complaint. The Processor reads only what that purpose needs, logs every access and tells the member of staff that their conversation was read. In a failure or a security incident the Processor examines the system logs and the answer record, with the sources, their versions and the checks, and never a conversation.”
- Data processing agreement, art. 5.6: “The Processor answers a legal demand by the route of clauses 3.7 and 6.6, with only what the demand asks; then too the Processor logs the access and tells the member of staff that their conversation was read, unless the law forbids it.”
- Privacy statement, Staff conversations: “Whoever made the request gets a finding about Inora, never what the member of staff asked or read.”

Rule 6. Reports only per team of five or more.

- Data processing agreement, art. 5.6: “Usage reports cover teams of at least five people only: per team to the team lead and the works council; the board and quality receive only the sum across all teams. For those reports the language model that writes the answer sorts the conversation by topic in the same step, without names; no person reads along, and the sorting stays in the Environment and is deleted with the conversation (Annex 1, item 2). These reports are part of Inora and need no separate instruction.”
- Privacy statement, Staff conversations: “The monthly report shows, per team, the topics staff ask about and the topics that found no answer yet, with a count, never a question as someone typed it and never per person.”

Rule 7. A question with no answer goes as a topic, without a name and without the asker’s words, to the owner.

- Data processing agreement, art. 5.6: “A question without an answer goes as a topic, without a name and without the asker’s words, to whoever owns the subject. 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.”
- Privacy statement, Staff conversations: “When the answer is not in the 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 can be completed. The name of whoever asked does not go with it.”

Rule 8. A failure is a finding about the system.

- Data processing agreement, art. 5.6: “A wrong answer is a finding about Inora and the source, never about the member of staff who came across it.”
- Trust, No one is blamed: “Without blame: in the source, the model, the software around it, the configuration and our own way of working. No finding names whoever came across the failure.”
- Consent request, condition 8: “A wrong answer is a finding about Inora and the source, never about the member of staff who came across it.”

Rule 9. What a care worker asks Inora never reaches the organisation; by name only the competence record goes.

- Record log: 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.
- Data processing agreement, art. 5.6: “Besides what the member of staff sends themselves, such as their report on their approval or their incident report, only the competence record the inspectorate expects the Controller to keep (Wkkgz, Wet BIG), for reserved and high-risk procedures under its training policy, goes to the Controller per worker. It records only the procedure, the protocol with its version, the date and on whose instruction, never the content of a conversation, a score or a usage figure. Only the Controller’s team lead and training department see the competence record, and the member of staff themselves. The worker sees their own competence record in Inora and receives a copy on request (Article 15 GDPR; Article 7).”

- Privacy statement, Staff conversations: “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 covers reserved and high-risk procedures under the organisation’s training policy, and it is the organisation’s own record.”
- Consent request, condition 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). The care worker’s questions to Inora never count, not even as evidence of competence.”

The test set: only with the council’s consent.

- Data processing agreement, art. 3.8: “No Staff Member of the Processor reads a question or answer in the test set; testing a new version is automated.”
- Consent request, condition 11: “We switch on the test set only if you consent to it separately below.”

7. Retention and logs

Data	What for	How long, and what the organisation receives
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	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, set by the organisation; no one in the organisation opens them. If the organisation asks 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

Data	What for	How long, and what the organisation receives
Logs: sign-ins, administrative actions and every access by Axiomatic	Keeping the service secure	12 months. On request the organisation receives 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
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 the organisation
Test set: questions from the organisation and flagged answers with their question, names removed	Only on the organisation’s written instruction, after the works council’s consent, to test new versions; no person reads a question or answer for it	Until the organisation withdraws 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 and on whose instruction	The record the inspectorate expects of the organisation (Wkkgz, Wet BIG)	In Inora for as long as the care worker works for the organisation, plus 30 days; in those 30 days the organisation exports it to its own personnel file, where its 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. The organisation receives it only on written request, never who asked

Apart from the competence record and what the member of staff sends themselves, nothing from any of these data goes to the organisation per member of staff. In an outage or security incident Axiomatic examines the system logs and the answer record, never a conversation, and reports a finding about the system, naming no care worker. After the agreement ends, everything is deleted from active systems within 30 days and from backups within 60 days, and on request confirmed in writing.

8. What staff gain

The council protects staff, and weighs what they get too. Inora takes three steps out of the shift: finding out how it is done here (the organisation's own protocol, with its source, at the bedside), doing it and logging it, and writing it up (the report is ready before the care worker gets back in the car: Inora readies it, they sign, and it goes into the record on their approval). Care workers say so themselves:

- "Good to check something quickly without having to call anyone. It gives certainty." Care worker, South Limburg, questionnaire report, ZorgConnect Zuid-Limburg, 12 January 2026.
- "It helps me have better conversations with doctors, clients or family and feel safer in my work, even when there is no colleague nearby to ask a question." Nurse, Limburg, De Limburger, 22 April 2026.
- "It confirms what I already know. That gives me peace of mind." Care worker, South Limburg, questionnaire report, ZorgConnect Zuid-Limburg, 12 January 2026.

The time that comes back. It goes back to care: to clients, and to the work that now waits until after the shift. The organisation decides on staffing, not Axiomatic, and Axiomatic never sells Inora as a cut in staff. The model request sets this down as condition 10. A funding application counts in fte saved, as the scheme asks; what the organisation does with that time, the board puts to the council separately.

Works councils of care organisations that work with Inora consented to a request with the same rules, usually in one meeting. "We consented in one meeting. The letter was already there." Works council member, care group.

9. Consent, evaluation and change

The model consent request sets the nine rules of the line down as the conditions of consent, with the terms on the time that comes back as the tenth and the test set as the eleventh: the organisation switches it on only if the council consents. Besides that:

- **When.** The board puts the consent request to you during the pilot: in a pharmacy the pharmacist-owner, in a municipality the management. The council consents after at least one consultation meeting (WOR article 27(2)); without consent no other team follows and Inora Matrix does not become the official competence register. The pilot runs eight weeks; after it the organisation decides which teams follow, and every new purpose comes back to you as a new consent request.

- **Evaluation.** The board evaluates the introduction with the council after the eight-week pilot and every year after, with the monthly report per team and an overview of every access by Axiomatic, without its content.
- **Change.** Every change to the conditions, and every other purpose, comes back to the council as a new request for consent. What management sees per team cannot quietly grow; the terms with Axiomatic change only in writing.
- **If a condition is not kept.** Use outside the conditions is a decision without consent. The council can invoke its nullity in writing, within one month of the board telling it of that use or of it becoming apparent to the council (WOR article 27(5)), and the board stops that use.

10. The documents with this pack

- Privacy statement, with Staff conversations: axiomatic.digital/en/trust/privacy.
- Inora and the EU AI Act, with What Inora never does: axiomatic.digital/en/trust/ai-act.
- Data processing agreement with Axiomatic.
- An example of the monthly report per team (section 4).
- Information letter and model consent request, version 1.7 of 7 November 2026.