

Full Data Protection Impact Assessment (DPIA)

When to complete this form. Please make sure that you have been told by a member of the Data Protection Advice Team (DPAT) to complete a full Data Protection Impact Assessment (DPIA). A full DPIA **must** be completed where there is a **high-risk** in the processing of personal data ([Examples of processing 'likely to result in high risk' | ICO .](#)) otherwise only a pre-screen is needed, see [Data Protection Impact Assessments \(sharepoint.com\)](#)

When not to complete the form: If you haven't been told by DPAT or in a pre-screen you need a full DPIA. Don't spend time doing a full one if it's not needed. If you will be using the processing to prosecute people then don't use this form. We are working on a new DPIA especially for that as it's a different part of Data Protection law. Ask DPA@camden.gov.uk for advice.

Top Tips: please complete all sections 1-9 in as much detail as you can. If you're not sure please ask the Information Rights Officer (IRO) you're dealing with or DPA@camden.gov.uk . **Please don't use technical** terms or jargon without explaining what they mean. Please explain acronyms the first time you use them. Explain your project in clear terms, as though the reader knows nothing about it. We publish full DPIAs but will redact junior staff names. If you have any concerns about publication your IRO can discuss redactions with you.

When completed: share with your Information Rights Officer (IRO) via OneDrive with edit rights.

Project Name	Magic Notes AI Pilot and Access NotesCentre Pilot
Your ref	
Who has completed the DPIA?	████████████████████
Who are the Information Asset Owners? (Data Roles & Responsibilities (sharepoint.com))	████████████████████ / Magic Notes AI & Access NotesCentre
	████████████████████ / Magic Notes AI & Access NotesCentre
	Rashida Baig / Magic Notes AI & Access NotesCentre

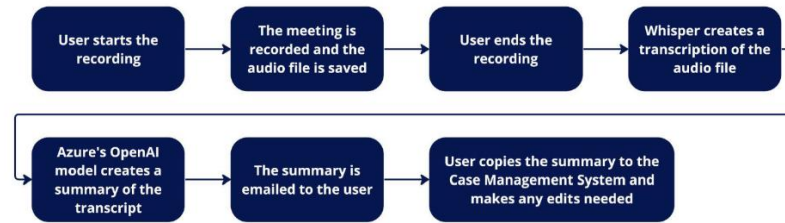
DPAT Use Only

DPAT Reference (DP24_xxx)	DP25_262
Officer dealing	Sarah Laws
Date Received	April 2025
Date cleared by DPAT	8/5/25
Date submitted to DPO	8/5/25
Date Approved	15/5/25

1. General Details

Project Title:	Magic Notes AI and Access Notes Pilot
Purpose and Benefits : what data processing are you doing that is new or different. Why are we doing it? What are the outcomes, and the benefits to the council and/or residents/ stakeholders?	<p>This DPIA is part of the development of a new product by the London Borough of Camden and BEAM UP Limited for Magic Notes and with The Access Group for Access NotesCentre</p> <p>This DPIA will cover the Magic Notes proof-of-concept phase of the project, will last for 6 weeks from approval. The DPIA will also cover The Access Group, Access NoteCentre project pilot over a 12-week period and will follow the Magic Notes project. The proof of concept will enable Social Workers to record conversations with residents, children and young people, carers, practitioners, provider staff and others involved in the delivery of services to residents and have this conversation transcribed, summarised and list of actions created by a web app that has been created by BEAM and the Access Group.</p> <p>The project is aiming to reduce manual typing up of conversation notes, improve the accuracy and detail of the recording of notes to deliver better assessments, reviews and creation of plans in a timely way. The expectation is that this will also improve data quality and security by removing paper transportation between individual's homes and the office.</p> <p>The conversations will be recorded and transcribed using an AI tool on the social worker's work mobile phone, however this AI tool will not be making decisions on behalf of the data subjects. It may provide suggested actions from the conversation</p> <p>It will involve the processing of personal information, health information, care and support needs.</p> <p>Magic Notes and Access NoteCentre are web apps which will record a conversation that will be stored on the Magic note's/ Access NoteCentre cloud environment. A transcription will be created based on this recording.</p> <p>Using the transcription, a Large Language Model will create a summary based on built in prompts agreed with LB Camden. The prompts will be designed to extract the relevant parts of the conversation depending on the nature of the meeting.</p> <p>There are consistent issues with case recording in Mosaic by ASC and CSSW practitioners- external auditing and our own QA processes where non personalised language is used. The purpose of this pilot is both to increase practitioner time to spend with individuals, improve the quality and save administrative time reviewing case recordings</p> <p>The purpose of the processing is to:</p> <p>Increase accuracy and volume of case notes and records which are less prone to human error.</p> <p>Enhance service quality by allowing social care practitioners to focus on asking the right questions as opposed to writing notes down.</p>

	<p>Save social workers time by generating summaries for them to review, rather than these needing to be written in rough format before being ‘typed up’ into a case management system.</p> <p>Transcripts are also available for practitioners to check back on the accuracy of the summaries.</p> <p>There is also scope for the tool to be used for scenarios where service users are speaking in another language. The software is able to translate conversation which may avoid the need for an interpreter. At the same time if an Interpreter does not capture everything this may improve the accuracy and of the translation.</p> <p>This will also enable Staff to undertake more visits and therefore improve efficiency, reduce backlogs and deliver better quality of service.</p> <p>During a demonstration where practitioners role played a conversation between a practitioner and an individual – at one point the person role playing the individual mentioned in passing they struggled slightly to use their phone.</p> <p>The case summary created a potential action to investigate technology training to support them to use their phone. Neither of the people in the role play had picked that up – this is a clear benefit of the approach that we want to test further in the pilot.</p>
<p>Summary of the data processing: (where will the data come from and how will you obtain it, what will you do with it. Will you be sharing it with any third parties eg companies or agencies like police/NHS?)</p>	<p>Details:</p> <p>Staff will input residents' details - from referral forms and Mosaic = the level of detail can be adjusted as required to minimize personal data.</p> <p>Staff will record the conversation on their work phones using the BEAM/The Access Group web apps.</p> <p>The recording, transcription and summary will be held within the application on Beams/The Access Group servers/cloud environment</p> <p>The applications will process the transcription using Whisper AI/ Chat GPT, v4.0-mini respectively to produce a summary.</p> <p>Magic Notes For Magic Notes the Staff member will be emailed a link to the stored audio file, transcript and summary to review the and download the audio file which will be stored on the council network.</p> <p>The staff member will review the transcription and summary before transferring it to the case notes within Mosaic.</p> <p>The deletion of the file from Beams servers will be determined as part of the data sharing agreement.</p> <p>Data processing Magic Notes records, transcribes and summarises meetings through the flow mapped out below:</p>



Social worker starts the recording

The social worker taps a button which starts the audio recording and creates an audio file (detailed below).

The meeting is recorded and the audio file is saved

What data and information are discussed in the meetings which are recorded? Social workers will use Magic Notes to record meetings that they have with people. The initial focus of the pilot is to record Care Assessment (ASC)/ Child in Need (CSSW) meetings. These are wide-ranging needs assessments where the social worker and individual will discuss: living situation, medical history, health, support and wellbeing, finances and care needs.

- Data involved: audio file of the meeting recording, name of the service user entered by the social worker, date and time the recording started.
- Provider: Beam's technology records and stores the audio recording.
- Storage: Stored on Amazon Web Services servers in the UK.
- Nothing will be stored on the phone – it will all be saved in the cloud.

Social worker ends the recording

The social worker taps a button which ends the audio recording (detailed above) and triggers the transcription process (detailed below).

Whisper creates a transcription of the audio file

- Data involved: written transcript of the meeting created from the audio file of the meeting recording.
- Provider: Microsoft Azure's cloud deployment of Whisper creates the transcript which is then stored on Beam's servers. Whisper processes the audio file to produce the transcript but does not store any of the data. The version of Whisper we are using is based in the EU.
- Storage: stored on Amazon Web Services servers in the UK.

Azure's OpenAI model creates a summary of the transcript

- Data involved: written summary of the meeting created using the written transcript of the meeting.
- Provider: Azure's OpenAI API creates the summary of the transcript which is then stored on Beam's servers. Azure processes the transcript file to produce the summary. It does not store any of the transcript or the summary data, and none of the data it processes is used to train models or available to any other users. Azure's OpenAI model is based in the UK.
- Storage: Stored on Amazon Web Services servers in the UK.

The summary is emailed to the social worker.

For the proof of concept, the social worker will be sent an email to their council email address containing a link to view the full transcript in the Magic Notes web app.

Social worker copies the summary to the Case Management System and makes any edits needed

The social worker copies and pastes the meeting summary into the existing Case Management System used by the council.

Deletion of data

All data will be deleted at the end of the 6-week pilot. Any future use of magic notes data will be deleted within one month of recording.

Access NotesCentre

The Data

Duration of Processing

Processing will continue for the duration of the active contract. Access does not apply retention schedules to client data other than for backups (see backup section) and deletion of data on termination of contract in line with our Exit policy (unless there is a legal requirement for Access to retain the data)

Nature of Processing

Hosted: Access group will receive data uploaded to the service by users, which is stored in a cloud environment in accordance with the options selected by Camden. Users may instruct the service to share some or all of the data with other users or groups/classes of users.

Purpose of Processing

Is to create an AI Summary from voice and/or text and then provide this output into the wider Access product portfolio

Categories of Data Subject

Data may be related to the following categories of data Subjects: NotesCentre User, Service user and related persons and other professionals

Personal information, that on its own or with any other data in the system, can identify an individual

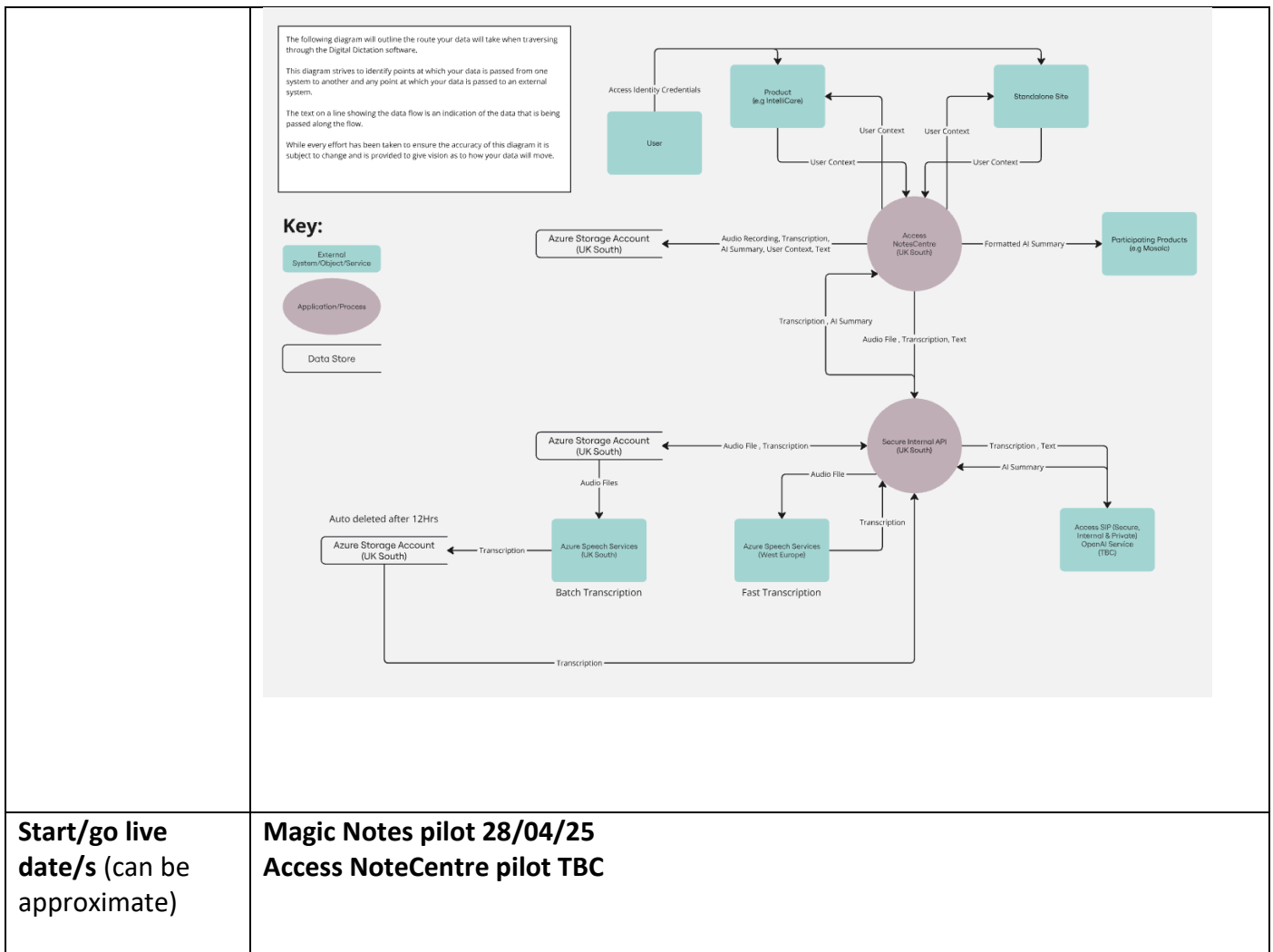
This is the data we expect to capture, but due to the nature of the product, the voice and text captured is likely to be personal data, including but not limited to:

- Social Care Worker Names
- Patient Names
- Patient Date of Births
- Patient Addresses
- Patient Personal Details & Disclaimer + Backlog

Special categories of Data stored

This is the data we expect to store, but due to the nature of the product, the voice and text stored is likely to be: Health data, Medication data, Child in Need data, Child Protection data, Looked After Child (LAC) data, Safeguarding, Financial data

Data Flow Diagram



2. Types of Data and Data Subjects: Whose data are you going to be using, and what types of data will you process?

<p>Whose data? Please list them Eg Resident/service user, employees, children etc</p>	<p>Residents including children and young people, parents, family members, carers, practitioners, provider staff and others involved in the delivery of services to residents.</p>
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What data? Check the boxes for a yes

Personal Data			
Name	<input checked="" type="checkbox"/>	Telephone/mobile	<input checked="" type="checkbox"/>
Address	<input checked="" type="checkbox"/>	Email	<input checked="" type="checkbox"/>
Date of birth	<input checked="" type="checkbox"/>	National Insurance No.	<input type="checkbox"/>
Gender	<input checked="" type="checkbox"/>	Other data	<input checked="" type="checkbox"/>
Financial data	<input type="checkbox"/>	If other data please list it here: GP, Education details, school	

What data? Check the boxes for a yes

Special Categories of Personal Data			
Religious or philosophical beliefs	<input checked="" type="checkbox"/>	Genetic data	<input type="checkbox"/>
Social care records	<input checked="" type="checkbox"/>	Fingerprints/biometrics	<input type="checkbox"/>
Race or ethnic origin	<input checked="" type="checkbox"/>	Health	<input checked="" type="checkbox"/>
Political opinions	<input checked="" type="checkbox"/>	Data concerning sex life and/or orientation	<input checked="" type="checkbox"/>
Trade-union membership	<input type="checkbox"/>	Criminal convictions or allegations, status as witness/victim/survivor perpetrator of a crime	<input checked="" type="checkbox"/>
Physical or mental health	<input checked="" type="checkbox"/>	Please give a bit more detail if needed.	

3. **Data Protection Principles:** In this section you need to describe how the activity/project complies with the Data Protection Principles

Principle	Describe how the activity/project complies with the Data Protection Principle
<p>a. Lawfulness, fairness and transparency: Explain how the processing of personal data will be fair and transparent. (Please note: you will also need to complete <i>Section 4 Lawful Bases and Condition of Processing</i> below for the lawfulness element.).</p> <p>Fairness: Consider how the processing may affect the individuals concerned and how you can justify any adverse impact. We should only handle people’s data in ways they would reasonably expect eg as set out in the privacy notice, or where we can explain why any unexpected processing is justified.</p> <p>Transparency: We need to make sure we are open and honest, and comply with ‘the right to be informed’ Is this processing covered in the Privacy Notice for the service? If not, we need to think about adding it.</p>	<p>The dictation tool will provide a transcript of the meeting and conversation. This will be readily available and support the summary that the tool will form.</p> <p>Where the dictation tool will be used in meetings with clients/citizens they will be informed about the dictation tool being used at the beginning of the meeting.</p> <p>The Ai summary will support workers in summarising the notes improving the accuracy of recording notes.</p> <p>The system is locked down to prevent anyone from having immediate access. Access is only granted by authorisation from the customer for support purposes</p>
<p>b. Purpose limitation: we can’t use data we already have for a new purpose unless that aligns with why we collected/got it originally, or there is some law that allows this extra use. Provide details of how we got this data originally, and what we are using it for now, and how the new usage is</p>	<p>Information gathering will be collected via recordings in the Magic Notes/Access NoteCentre web apps instead of traditional means such as taking notes using a note pad or writing them up following the meeting in Word or directly into Mosaic</p>

<p>compatible with that. If it's new data collection, explain where it is coming from.</p>	
<p>c. Data minimisation: we need to collect/use what we need to achieve the aims of the project. But we mustn't collect or use data that is excessive ie that we don't need or 'just in case'. Explain how data processed will be adequate, relevant and limited to the purposes for which it is processed.</p>	<p>The Magic Note/Access NotesCentre web apps are dictation tools that will only transcribe the meeting and create a summary from what has been recorded.</p>
<p>d. Accuracy: we need to take all reasonable steps to ensure the personal data is factually correct. Explain how you will do that eg relying on the people to give us the right information or it will come from a council system. Will you need to keep the personal data updated? If so how? And how will you correct anything that is wrong?</p>	<p>Accuracy and transparency</p> <ul style="list-style-type: none"> • The use of Magic Notes and Access NoteCentre must always be accompanied by real-person check - it will not 'automatically' add anything to the case management system but rather provide a first draft that has taken very little time to prepare • Frontline staff will notify individuals at the start of every meeting they are being recorded, giving them the opportunity to object to being recorded. <p>All frontline staff using the product will be trained on using it appropriately and securely before getting access to Magic Notes/Access NotesCentre.</p>
<p>Storage limitation: we must keep data for as long as the law requires or for as long as we have a business need for it, if there's no set period. We must not keep it just in case or longer than needed. Explain how long you will keep it for. How will you delete it at the end of the retention period?</p>	<p>Data will be deleted from Beam's system on a monthly basis – with retention set at a period of 1 month.</p> <p>Magic Notes users can request for data to be deleted at any time by emailing hello@beam.org. Beam will action all requests within 1 calendar month.</p> <p>Data will be retained for 30 days for Access NotesCentre</p>
<p>e. Security (Integrity and confidentiality). This is covered in section 6 below.</p>	<p>N/A. This is covered in section 6 below.</p>

4. **Sharing with other organisations or companies.** We need to know if we are sharing some or all of the data with any other party, and if so what their status is. List the organisations/third parties/partners involved with sharing or processing the data for this activity in the table. Please add/delete rows, as appropriate. If you're not sure if anyone is a processor or controller please check the don't know box and we will assist you when the DPIA is submitted.

We also need to know what documentation we have (or will have) to put the terms and conditions with those 3rd parties in writing. This might be a contract or a Data Sharing Agreement or a Memorandum of Understanding, in draft or live. If you don't know please say so and we will advise you.

Party	Data Controller	Data Processor	Joint Controller	Don't know and need help	What do we have to set out the agreement with them?
Camden council (usually data controller)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	N/A
<i>Beam Up Ltd, Shoreditch Exchange, Senna Building, Gorsuch Place E2 8JF</i>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
<i>Access UK Ltd, The Armstrong Building, 10 Oakwood Drive, Loughborough, LE11 3QF</i>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

5 **Lawful Basis and Conditions of Processing.**

Data protection law says we have to have a lawful basis to use personal data and an extra one for special category (sensitive) data and for criminal offence data. DPAT will help you identify your lawful basis and will fill this in. **But you need to tell us what law you're working under.** Is there some law that says you must or can or should do this? It might be very specific - eg 'you must collect council tax in this way' - or it might be an enabling power eg 'the council has a general power to provide anti-smoking advice'. We need to know what it is to help work out the data protection lawful basis. If you think you need consent please read our advice page [Consent and Data Protection \(sharepoint.com\)](https://sharepoint.com) first, and if you still think you need consent say so below and DPAT will have a chat with you about it.

Our underpinning law for this project/processing	Care Act 2014 Children Act 1989 Children Act 2004
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For DPAT to complete	
Personal data art 6(1)	(e) processing is necessary for the performance of a task carried out in the public interest

Special Category Data art 9 (2)	<p>(b) Employment, social security and social protection (if authorised by law) with the Data Protection Act 2018 Schedule 1 part 1 condition being para 2 health or social care purposes</p> <p>(g) processing is necessary for reasons of substantial public interest with the Data Protection Act 2018 Schedule 2 Part 2 conditions being para 6 Statutory and government purposes, para 18 Safeguarding purposes, and para 19 Safeguarding the economic well-being of vulnerable adults with the underlying law for all being Care Act, Health and Safety at Work etc Act 1974 and Localism Act 2011;</p> <p>(h) Health or social care with the Data Protection Act 2018 Schedule 1 part 1 condition being para 1 employment, social security and social protection with the underlying law being as above.</p>
Criminal Offence Data art 10: what art 6(1) and DPA18 schedule conditions:	The article 10 requirements are met by the article 6 condition as for personal data and the Data Protection Act conditions as for special category data.

6. Data security We must keep data safely and securely. This includes protection against unauthorised or unlawful access or use, and against accidental loss, destruction and damage.

Area	Give details
<p>Where will data be stored? (eg council system like Mosaic, shared drive, online portal, new system, processor doing this).</p>	<ul style="list-style-type: none"> • Magic Notes • AWS - Hosting provider and emails to users; Stored and processed in the UK Sweden. • Azure - Hosting provider for access to summarisation and transcription algorithms; Processed in the UK and Sweden. • Heroku - Website application host and redis cache; Processed in the UK. • Kinde - Logon authentication provider; Processed in the UK. • Google - Usage analytics, onboarding, customer support; Stored and processed in the UK. • ZenDesk - Customer support; Stored and processed in the UK. <p>Access NoteCentre MS Azure UK South (System Databases – user data, uploaded files(PDFs etc) and APIs)</p>
<p>How will data be transferred? (eg secure file transfer, email, online portal)</p>	Online portal

<p>What roles will have access to the data? Is there effective Role Based Access Control (RBAC) to make sure only those who should have access do have access?</p>	<p>Magic Notes Practitioners will only be able to see the data they record.</p> <p>Team Leads will have access to a manager portal to view content recorded by their team</p> <p>Access NotesCentre Practitioners will be the only person that will be able to access and upload recordings into the portal. However, sharing of recordings/summaries is possible through email</p>
<p>Can the systems being used be audited to see what user has done what actions?</p>	<p>Magic Notes - Yes Access NotesCentre - TBC</p>
<p>Have you consulted with the Information Security Team? Have they cleared the system/equipment etc? Give details of their advice/clearance:</p>	<p>Magic Notes – Yes- approved Access NotesCentre – Not yet – Infosec Assessment to be completed prior to pilot</p>

7. Other processing types: There are some special areas of processing that are much higher risk where we will need additional information and or other forms completing. At this stage we need a yes/no and a little information. If we think the answer is yes then DPAT will ask for extra information/forms.

Area	Yes	No	Don't Know	Details
<p>Will you be using AI (artificial intelligence)?</p>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<p>If YES what system/tool/product and what will it do? Magic Notes - Whisper AI Access NoteCentre - Chat-GPT</p> <p>Both will process transcripts and produce a summary to formats appropriate to agreed templates as part of pilots An AIRA has been completed for both and is attached to this DPIA</p>
<p>Will you be using automated decision making? (This is where a computer makes the decision that makes a material difference to someone and a human doesn't have the final say so. It's not for very basic things like emailing a letter.)</p>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<p>If YES what system/tool/product and what will it do?</p>

Will you be using CCTV, body worn video, dash cams or similar?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	If YES what system/tool/product and what will it do?
Will you be doing profiling? That is automated processing of personal data to evaluate certain things about an individual. There are specific rights around this, and if applicable we will expand this section to cover them.	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	If YES exactly what are you doing?
Will you be using facial recognition/finger prints or other biometric data?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	If YES what system/tool/product and what will it do?
Will you be doing any Marketing? This includes advertising of products and services.	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	If YES what exactly are you doing?
International Data Transfers: will any of the data be transferred or processed or stored etc outside the UK? This includes by data processors eg companies or organizations doing processing for us. It also includes their sub-processors – often IT support companies used by contractors.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	If Yes: list the countries. (If they are outside the EU and not on a list of ‘adequate’ countries there will be additional information required). Sweden

8 **Data Subject Rights:** data subjects (the people whose data is being used) have some rights. Which ones apply depend on the legal basis being used. [Data Subject Rights under Data Protection Law \(sharepoint.com\)](https://sharepoint.com).

Data Subject Right	Detail Required
Right to be informed: When collecting personal data detailed information in the form of a privacy notice needs to be made available to data subjects, explaining why and how personal data is being collected /used. Check if this is already covered: Data protection, privacy and cookies - Camden Council .	Is it already covered in your Privacy Notice? YES and paste in link to it <input checked="" type="checkbox"/> No <input type="checkbox"/> If it's not covered you will need to do one either in full or a short paragraph. DPAT will advise you.
Right to access (also known as 'subject access requests') : Everyone is entitled to have a copy of the personal data we are processing, there are some exceptions when information would be withheld.	Tick to check you have understood this right: <input checked="" type="checkbox"/>
Right to rectification: Data subjects have the right to correct inaccurate factual personal data about them (this is factual data not opinions of professionals)	Will you be able to correct factually wrong data? YES <input checked="" type="checkbox"/> NO <input type="checkbox"/>

<p>Right to object: depending on the legal basis data subjects may have the right to object to the processing of their personal data by a data controller, requiring them to cease the processing in certain circumstances.</p>	<p>If your legal basis means this right applies we will advise you and you will need to add in here how it will be met.</p> <p>Right may apply. Will be for the practitioner to decide at the time whether to agree to the objection or not. Given agreeing will mean the tool cannot be used and the benefits cannot be obtained it is likely that an objection will generally not be agreed to. It will be important that practitioners do not let this become an asking for consent and so it is recommended that people are told this is happening via the privacy notice.</p>
<p>a) Right to erasure (also known as ‘Right to be forgotten’): depending on the legal basis data subjects may have the right to request the erasure of their personal data.</p>	<p>If your legal basis means this right applies we will advise you and you will need to add in here how it will be met.</p> <p>Right will not apply.</p>

9 **Risk Management.** We have to identify the data protection, privacy and security risks of this new processing, and then assess their severity and identify mitigations to reduce risk to an acceptable level (medium or low).

- i) Identify and detail the risk in the first column. Use one row per risk.
- ii) Use the ICO’s risk assessment matrix below to see what level of risk each one is and enter that in the Initial Risk column.
- iii) Then identify what measures there are or could be to mitigate (reduce or eliminate) any risks identified as medium or high risk. Low risks do not need to be reduced. Remember you do not need to eliminate risks if not practical: it is adequate to reduce to an acceptable level and medium risk can be acceptable. Put the details in the ‘measures’ column.
- iv) Reassess the risk with those mitigations in place using the ICO’s table. It might be the same or lower- it shouldn’t be higher!
- v) Enter the mitigated risk level in ‘residual risk’.
- vi) When the Information Asset Owner/s agree the DPIA they will put ‘yes’ (or ‘no’ if they disagree) in the last column.

ICO's Risk Assessment Table

Severity of impact	Serious harm	Low risk	High risk	High risk
	Some impact	Low risk	Medium risk	High risk
	Minimal impact	Low risk	Low risk	Low risk
		Remote	Reasonable possibility	More likely than not
Likelihood of harm				

Identify and assess risks		Identify measures to reduce risk			
Describe the source of data protection, privacy and security risks risk and nature of potential impact on individuals. (Please add more rows if needed.)					
Risks		Initial risk (based on Likelihood and Severity of harm)	Measures to reduce risk to acceptable level	Residual risk	Does the Information Asset Owner accept this risk?
1	Information is unsecure , risk of data breach and accessible to anyone	Low	Individuals have been set up with their own login and passwords	Low	Yes
2	Dictation tool is inaccurate or if Dictation tool is unable to understand a language	Medium	Pilot period will ascertain if the dictation tool is accurate and Pilot users need to be clear what languages the dictation tool is compatible with	Low	Yes

