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Data protection and Inclusive AI: Assessing Risks from an ex ante perspective

Protezione dei dati personali e intelligenza artificiale inclusiva: approccio ex ante e valutazione dei rischi

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Abstract

The development of Artificial Intelligence (AI) systems increasingly relies on the large-scale processing of personal data, including special categories of data, thereby raising significant data protection and privacy concerns for persons with disabilities. While AI-based technologies may enhance accessibility, autonomy, and social participation, data-intensive AI applications – particularly in healthcare, assistive technologies, and caregiving contexts – may also exacerbate existing vulnerabilities. Adopting an ex ante perspective, this contribution examines how the principles of data protection law interact with broader requirements of accessibility, non-discrimination, and respect for individual autonomy. Particular attention is devoted to the role of inclusive and representative datasets in AI training, as well as to the use of impact assessment mechanisms and the meaningful involvement of persons with disabilities in the design, deployment, and governance of AI systems.

Lo sviluppo dei sistemi di intelligenza artificiale (IA) fondato sul trattamento di dati personali solleva rilevanti questioni critiche per le persone con disabilità. Se da un lato le tecnologie basate sull'IA possono favorire l'accessibilità, l'autonomia e la partecipazione sociale, dall'altro queste possono accentuare vulnerabilità preesistenti. Adottando una prospettiva ex ante, il contributo analizza l'interazione tra la protezione dei dati personali e le più ampie esigenze di accessibilità, non discriminazione e rispetto dell'autonomia individuale. Particolare attenzione è dedicata al ruolo di set di dati inclusivi e rappresentativi nell'addestramento dei sistemi di IA, all'impiego di meccanismi di impact assesment e al coinvolgimento delle persone con disabilità nei processi di progettazione e governance dei sistemi

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Keywords: disabilities, Artificial Intelligence, vulnerabilities, risk assessment

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1. Introduction[1].

Artificial Intelligence (AI) is shaping social life, through an accelerated stream of innovations that affect individuals and communities. As many social functions — communication, access to knowledge, mobility, economic and political activities — take place through the mediation of more and more intelligent, autonomous and pervasive machines, AI has come to a key role in the multiple socio-technical arrangements that define opportunities for and constraints over individuals, according to their abilities and social roles. This means that AI has also come to play a crucial and indeed constitutive role regarding disabilities: it contributes to determine what impairments may concern individuals in what ways, exposing them to what vulnerabilities, and how such impairments and vulnerabilities can be remedied, mitigated or rather aggravated.

A broad significance of AI for disability follows indeed from the social model of disability, which has superseded the medical one, according to which individuals are not identified with their medical condition (disability), but their impairments (disabilities) are viewed as differences that require a contextual social (and therefore also a technological) response. This special model is depicted in Art. 1 of United Nations Convention on the Rights of Persons of Disabilities (from now UNCRPD) that states: "*Persons with disabilities include those who have long-term physical, mental, intellectual or sensory impairments which in interaction with various barriers may hinder their full and effective participation in society on an equal basis with others*", and that "*disability is an evolving concept, that results from the interaction between persons with impairments and attitudinal and environmental barriers*".

AI technologies crucially contribute to the contextual dimension of disability: they may support persons with disabilities (*e.g.* through medical research, assistive tools, and consumer products) improving their autonomy and inclusion but may also negatively impact on them (*e.g.* from non-inclusive

[1] This work is dedicated to honouring the eminent and lasting scientific contribution of Professor Cesare Massimo Bianca that, through distinguished legislative, academic, and professional activities, has greatly advanced the study and protection of vulnerable persons.

design and biased datasets) restricting their self-determination and exposing them to discrimination.

These opportunities and risks call from an ethical and legal response.[2] The legal framework is shaped by international and domestic sources that establish accessibility, non-discrimination, and respect for human dignity as guiding principles. Ethical considerations—fairness, autonomy, justice—complement legal principles and rules, reinforcing the need for equitable access to supportive technologies, inclusive design and governance. This ethical and legal response to disability must take into account the way in which AI may affect the vulnerability of persons with disabilities, *i.e.*, whether and under what conditions AI may reduce or rather increase the extent to which persons with disabilities are exposed to harm or disadvantage (*e.g.* depending on how datasets and processes are designed, and ethical safeguards are implemented, see rec. 29 EU Regulation 2024/1689, from now AI ACT).

The chapter is divided into the following sections.

First, in Section II, we shall consider how AI systems can support persons with disability, and benefit them by mitigating or overcoming their impairments

Then, in section III, we shall focus how AI can negatively impact on persons with disabilities, subjecting them to specific risks related to their vulnerabilities.

In section IV we shall consider how legal norms and ethical principles may contribute to ensuring that AI systems are developed and deployed in ways that support rather than disadvantaging persons with disability.

2. AI in Support of Persons with Disabilities.

The UNCRPD acknowledges the role of technologies in supporting persons with disabilities, by requiring States Parties to promote research, development and use of new technologies, including assistive technologies suitable for persons with disabilities, giving priority to technologies at an affordable cost (Art. 4, letter g)).

New technologies are thus at the core of the protection of persons with disabilities. Such technologies can contribute to mitigating or overcoming their impairments, and thus to enhance their autonomy and ensure the full enjoyment of all universally recognized human rights: accessibility to physical and virtual environments to enable full participation in all aspects of life (Art. 9); personal mobility (Art. 20); habilitation and rehabilitation, particularly in the fields of health, employment, education, and social services (Art. 26); and freedom of expression, opinion and information (Art. 21).

AI – based tools may support in different ways people with disabilities, enhancing their autonomy, communication, health, and daily live. Such tools can be grouped in three categories: a) Health Technologies, used for diagnosis, treatment, monitoring and rehabilitation, [3] governed by the Medical device Regulation (EU) 2017/745 (form now MDR) to ensure safety and reliability; b) Assistive Technologies, technologies aimed at enhancing functioning and

[2] G Sartor, 'Artificial intelligence and human rights: Between law and ethics', in MJECL, (2020), p. 705-719

[3] A Tsutsumi, S Bhandarkar, V Ahuja, 'Applications of Artificial Intelligence for Developing Exoskeletons and Prosthetics', (2025) *PED*, 1-6.

independence of persons with disabilities outside clinical settings (*e.g.* robotics, screen readers, voice-input systems, and brain computer interfaces). International soft law instruments have clarified that assistive technology include all technological products capable of "*maintaining or improving an individual's functioning and independence, thereby promoting their well-being*".[4]

Table I
Examples of AI based technologies for persons with disabilities

Technology	Examples	Application Area
Automatic subtitling	Google Live Transcribe, Ava, Otter.ai	Accessibility for people with hearing impairments
Sign language translation apps	(currently under development)	Communication for people who are deaf or hard of hearing
Augmentative and Alternative Communication (AAC) using AI	Proloquo4Text, Predictable, Talkitt	Communication support for people with speech disabilities
Intelligent voice assistants		Daily support and accessibility for people with various disabilities
Smart text-to-speech readers	Kurzweil 3000, Microsoft Immersive Reader	Reading support for people with visual impairments or dyslexia
AI-powered writing support tools	Grammarly, QuillBot	Writing and learning support
Personalized educational apps	CogniAble, Niki Talk	Inclusive education and content adaptation for special needs
Smart screen readers	JAWS, NVDA, VoiceOver, TalkBack	Computer accessibility for people with visual disabilties
AI-based visual recognition apps	Seeing AI, Be My Eyes, Lookout	Visual perception support for people with visual disabilities
AI-powered OCR (Optical Character Recognition)	—	Digitization and accessibility of printed texts
AI-enhanced voice control	Voice Control (Apple), Dragon NaturallySpeaking	Voice control for people with motor disabilities
Eye tracking and gesture recognition systems	Tobii Eye Tracker, GlassOuse	Alternative interaction for people with motor disabilities
Psychological support chatbots	Woebot, Wysa	Psychological support and assisted communication
AI for assisted indoor/outdoor navigation	Soundscape, Wayfindr	Assisted navigation for people with orientation difficulties

An ultimate frontier of devices for persons with disabilities is represented by neurotechnologies, which include a broad spectrum of hardware (*e.g.* electrodes, recording devices) and software (*e.g.* to interpret or generate

[4] WHO, UNICEF, Global Report on Assistive Technology, May [2022].

electric signals) designed to access, monitor, assess, simulate, or modulate the human nervous system. Their purpose is to understand, influence, restore, or predict brain activity, functions, and intentions. [5] They include Brain-Computer Interfaces (BCIs), which help restore motor function, sensory perception, and communication abilities in individuals with neurological disorders or injuries trough the decode of neuronal activity patterns. [6]

Table II
Classification of BCIs based on data transmission methods and invasiveness. [7]

Type/Classification	Description
Unidirectional	Signals travel from the brain to the computer, enabling users to execute commands or interact with external devices.
Bidirectional	These systems both record neural activity and deliver targeted stimulation to the brain.
Invasive	Require surgical implantation of electrodes directly into or on the surface of the brain.
Non-invasive	Use external sensors, avoiding the risks associated with surgery.
Partially invasive	Require minimal surgery or utilize pre-existing medical technologies (such as stents or catheters) to place electrodes near the brain without open surgery.

Neurotechnologies combined with AI can be used in various fields as direct-to-consumer product: in workplace, by enabling hands-free typing and data tasks; in education, by creating direct learning interfaces capable of adapting to individual needs; gaming, by allowing players to control games with their thoughts.

Therefore, neurotechnologies can serve as health technologies, assistive technologies, or simply as consumer products, depending on their design and use.

AI's contribution to mitigate disabilities raises the issue of the extent to which there may be an ethical or legal right by persons with disabilities to access effective technologies and corresponding obligations upon others to provide them with such technologies, as soon as they become available. An argument to this effect may be built by considering that technological support can contribute to the basic capabilities of persons with disabilities, thus enabling their effective enjoyment of their fundamental rights. [8] The legal dimension of such a right, as a social right whose satisfaction depends on the allocation of adequate resources, is dependent mostly from legislative choices: national legislation may recognise persons with disabilities right to AI-based

[5] Council of the European Union, *From Vision to Reality. Promises and risks of Brain-Computer Interfaces*, [2024]; Unesco, *First draft of the Recommendation on the Ethics of Neurotechnology*, [2024]; OECD, *Recommendation of the Council on Responsible Innovation in Neurotechnology*, [2019].
[6] Council of the European Union, *From Vision to Reality. Promises and risks of Brain-Computer Interfaces*, [2024]
[7] Council of the European Union, *From Vision to Reality. Promises and risks of Brain-Computer Interfaces*, [2024].
[8] A Sen, *Equality of What? The Tanner Lectures on Human Values* (Stanford University 1979).

supportive equipment, in accordance with the obligations established in this regard by Article 4, lett. g) of the UNCRPD.

Besides using AI in ways that are specifically related to their impairments, persons with disabilities may also use AI in unrelated ways: a person with a physical disability may use AI tools for internet search, for spam filtering, of for the generation of texts. Regarding such tools, disabilities can be relevant from a legal and ethical perspective, insofar as persons with disabilities may be exposed to specific additional risks: consider for instance the case of a persons with a cognitive disability being induced to enter disadvantageous online purchases, or other adverse bargains.

3. AI and the Vulnerabilities of Persons with Disabilities.

The interaction of persons with disabilities with AI systems could engender substantial risks for their health, safety and fundamental rights (see art. 5 (1) (b), rec. 29 EU Regulation 2024/1689, from now AI ACT).

For instance, assistive technologies may create technological dependency or limit users' autonomy or and exacerbate the digital divide (between the persons with disabilities who can or cannot have access to them). Neurotechnologies may intensify data protection risks (as brain data may reveal intimate mental states), their malfunction can cause physical or psychological harm, they may affect cognitive liberty, mental privacy, identity, and autonomy. Indeed, the possibility of decoding brain activity raises risks of undue influence, coercion, or loss of personal agency. [9]

Though AI could bring many benefits to persons with disabilities, contextualised assessments are needed to determine whether risks have been adequately prevented or mitigated, and on balance the residual risks are acceptable,[10] especially in relation to: data protection, manipulation or indirect discrimination.

3.1. Risks to Data protection and Privacy.

It is important to ensure the proper application of personal data protection legislation (*e.g.* EU Regulation 679/2917, GDPR)[11], to prevent the unlawful use of sensitive data relating to disabilities. Such data may be collected or inferred from other information by AI system providers[12]: consider the case of an AI device which, although not formally classified as assistive technology, can infer sensitive information about user's disability from the data it collects. Such

[9] United Nation Report, *Impact, opportunities and challenges of neurotechnology with regard to the promotion and protection of all human rights*, [2024], p. 10

[10] United Nation, *Rights of persons with disabilities. Report of the Special Rapporteur on the rights of persons with disabilities,* [2021].

[11] Bianca and FD Busnelli (eds), *La protezione dei dati personali: Commentario al D.Las. 30 giugno 2003, n.196* ("Codice della privacy") (Cedam 2007).

[12] In relation to automated decision-making process F Lagioia, G Sartor, 'Processo decisionale automatizzato relativo alle persone fisiche, compresa la profilazione', in R D'Orazio, G Finocchiaro, O Pollicino, G Resta (eds.) *Codice della privacy e Data Protection* (Giuffrè Francis Lefebvre 2021), pp. 378-390.

inferences may concern physical or cognitive disabilities (*e.g.* derived from behavioural patterns, voice inputs, eye movements, or interaction speed) or neurological conditions: this is particularly relevant in the case of data collected through neurotechnologies such as BCI. The processing of sensitive data relating to disabilities could result in discriminatory practices and affect persons health.[13]

In relation to such data, a primary issue concerns their legal classification, as there is currently no consensus on whether they should be considered health data. As a result, the appropriate legal basis for their processing remains uncertain. We argue that disability-related data should indeed be considered health data, as the regime of health data ensures a stronger protection of the concerned data subjects.

Data collected through neurotechnologies are highly complex data, and a preliminary classification distinguishes between *neural data* (linked to brain activity) and *mental data* inferred from neural data. The possibility of detecting the content of mental states of an individual (their beliefs, desires, emotions, etc) on the bases of neural data, creates new risks for the mental privacy, cognitive liberty, and self-determination of individuals,[14] and persons with disabilities who rely on neurotechnologies are most exposed to such risks.

3.2. Risks to Autonomy and Decision-making.

The risk of interference with self-determination and decision-making processes is inherent in every AI system: AI-based manipulation techniques can be used to influence individuals to engage in undesirable behaviour or to deceptively influence their decisions.

AI systems may employ subliminal stimuli – such as audio, visual, or graphic output – that individuals are unable to consciously perceive. They may also adopt other manipulative techniques that subvert or impact person's autonomy, decision-making, or freedom of choice without the individual's awareness or, if the person is aware, without their ability to control, resist, or avoid the deception.

However, the risk that AI might exploit the vulnerabilities of individuals based on disability is particularly acute in the case of certain devices, such as virtual reality systems of BCI, which may materially distort behaviour in significantly harmful ways.

BCI devices may influence or manipulate users – directly or indirectly – compromising their autonomy and self-determination (United Nation Report, 2024). While neurotechnologies may be highly beneficial to persons with disabilities (foster autonomy, social inclusion, recovery or support of mental and physical functions), they present severe risks: manipulation, alteration of mental privacy and social discrimination, psychological harm. Some scholars have affirmed the need to explicitly enacts new "*neurorights* i.e., human rights protecting individuals' interactions with neurotechnology, such as “cognitive

[13] B Zhang, C Chen, I Lee, K Lee, K Onga, ‘A survey on security and privacy issues in wearable health monitoring devices’ (2025) CS, 1-23.

[14] E Bertoni, M Ienca, ‘The Privacy and Data Protection Implication of the use of Neurotechnology and Neural Data from the Perspective of Convention’ (2024) Council of Europe, 1-30.

liberty", "mental privacy", "mental integrity", "psychological continuity".[15] On the other hand, the European Union in a soft law instrument has argued that existing legal frameworks may be sufficiently comprehensive if properly adapted to neurotechnologies.[16]

3.3. Risks of Indirect Discrimination.

A deeper and often overlooked issue relates AI-based discrimination against persons with disabilities.[17]

When AI systems are trained on biased or stigmatizing data, that may reflect the corresponding social prejudices. They may produce outputs or decisions that disadvantage persons with disabilities across various domains, including healthcare, employment, education, and justice, reinforcing negative stereotypes.

The resulting indirect discrimination violates both the principles of equality and non-discrimination as enshrined in the UNCRPD. Moreover, it also disrespects the obligations for fairness and data governance outlined in Art. 10 of the AI Act, which specifically requires datasets used for training, validation, and testing of high-risk AI systems that should be relevant, representative, free of errors or gaps that may lead to bias.

Addressing these risks demands a systemic effort in the way AI systems are designed and trained, one that embeds disability-inclusive data collection, participatory design processes, and ongoing impact assessments to ensure that AI technologies promote equal treatment.

4. Legal rules and ethical principles in AI for Persons with Disabilities: Accessibility, Inclusive data and Caregiving.

Outside the scope of the MDR, legal systems have not laid down a specific classification and regulation of assistive technologies, particularly regarding safety standards and inclusive design requirements. Thus, legal and ethical responses to the risks associated with AI systems, when used by persons with disabilities, must be grounded in general rules and principles.

Mainstream AI Systems and AI-based devices – whether generative or not – are essentially consumer services or products commonly used by persons with disabilities. They are subject to the general consumer product regulation (*e.g.* Regulation (UE) 2024/2847), and to other general rules on consumer protection and data protection.

However, some responses to the risks posed by AI to persons with disabilities can be found on particular rules on accessibility, inclusive design, non-discrimination, and impact assessment of AI systems toward users with disabilities.

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[15] M Ienca, R Andorno, 'Towards new human rights in the age of neuroscience and neurotechnology' (2017) LSSP, 5.

[16] European Parliament, *The Protection of Mental Privacy in Neuroscience: Social, Legal, and Ethical Challenges*, [2024].

[17] M Marks, 'Algorithmic Disability Discrimination', in I Glenn Cohen, C Shachat, A Silvers, M A Stein (eds.) *Disability, Health, Law and Bioethics*. Cambridge (Cambridge University Press, 2020), 242-254.

4.1. Accessibility and Inclusive Design in AI Systems.

Accessibility ensuring that persons with disabilities have access, on an equal basis with others, to the physical environment, transportation, information and communications technologies and systems (ICT), and other facilities and services (European Disability Strategy, 2010-2020).

Within EU law, accessibility standards have been developed to promote digital transformation while ensuring that services are genuinely inclusive and accessible to persons with disabilities, through various legal instruments: the European Accessibility Act (EU Dir. 2019/882) concerning the accessibility requirements for products and services; the Web Accessibility Directive (EU Dir. 2016/2102); the European Electronic Communications Code (EU Dir. 2018/1972); the Audiovisual Media Services Directive (EU Dir. 2018/1808); the Data Services Act (EU Reg. 2022/2065).

Some legal rules also address the inclusive design, to enable accessibility for persons with disabilities. For instance, persons with speech or language disabilities may not be able to use voice-activated AI tools effectively. The application of the principles of universal design – *Equitable use; Flexibility in use; Simple and intuitive; Perceptible information; Tolerance for error; Low physical effort; Size and space for approach and use* [18] – ensures full and equal access for all individuals who are potentially affected by or make use of AI technologies, including persons with disabilities.

The European AI Act states that "*providers and, as appropriate, deployers of all AI systems, high-risk or not, and AI models should also be encouraged to apply* […] *inclusive and diverse design and development of AI systems, including attention to vulnerable persons and accessibility to persons with disability*" (rec. 165) and that the Member States shall facilitate the drawing up of Codes of Conduct concerning the voluntary application, including by deployers, of specific requirements to all AI systems to assess and prevent the negative impact on vulnerable persons, including as regards accessibility for persons with disabilities (art. 95).

In the US legal system, the Americans with Disabilities Act (ADA), although enacted before the AI era, the Title II and III has been interpreted to require that websites, apps, and digital tools be accessible under the "effective communication" doctrine. Case law has extended ADA principles to AI-enabled public and commercial services, particularly where inaccessibility creates a barrier to equal participation.

4.2. Inclusive data in AI training.

The training of AI systems is a crucial point to prevent underrepresentation or exclusion in the datasets of persons with disabilities.

The quality of data, and the type of data, used for training is important to guarantee effectiveness, fairness, and inclusivity of AI systems. Consider the case of a voice recognition system that fails to understand different speech

[18] R L Mace, 'Universal design in housing', *RESNA*, (1998) 21–28.

patterns, including those used by persons with speech disabilities.[19] If persons with disabilities are underrepresented or excluded from the relevant training set, AI systems are likely to fail in recognizing, interpreting, or serving their needs, thereby undermining their right to equal participation.[20]

Possible biases which are likely to negatively affect persons with disability should be timely addressed and mitigated. The AI ACT explicitly states that the characteristics of natural persons belonging to vulnerable groups due to their age or disability should be taken into account when the AI system is intended to interact with those groups as well (rec. 132).

Art. 10 and art. 13 of the Act emphasize the quality and representativeness of datasets used in high-risk AI systems. Moreover, for non–high-risk systems, the EU Regulation encourages the adoption of codes of conduct to align AI systems with the requirements established for high-risk ones (Article 95); among these "*assessing and preventing the negative impact of AI systems on vulnerable persons or groups of vulnerable persons, including as regards accessibility for persons with a disability*".

4.3. System of proxy and delegation for Caregivers.

A complex issue concerns the role of caregivers in supervising and assisting the use of AI systems supporting persons with disabilities: Caregivers can facilitate access to the device in multiple ways: *e.g.* operating or configuring the technology; translating complex instructions; ensuring correct and safe use of devices; support autonomy in making informed decisions, expressing preferences and choices and or understanding AI generated suggestions or outputs.

There is a need for clear legal frameworks that recognize and regulate the role of caregivers or legal representatives in AI-assisted environments (*e.g.* in healthcare, education, communication).

Art. 14 of AI ACT states that a human oversight is needed to prevent or minimise the risks to health, safety or fundamental rights when a high-risk AI system is used in accordance with its intended purpose or under conditions of reasonably foreseeable misuse, where such risks persist despite the application of other requirements. In the case of persons with physical or cognitive disabilities who are unable to carry out the human oversight required by the Regulation, caregivers might act as intermediaries, protectors, and agents of empowerment in the interaction between persons with disabilities and AI systems, through modalities that do not undermine dignity and privacy.

4.4. Ex Ante Protection

The most innovative protection approach for safeguarding persons with disabilities from AI-related risks is the *ex ante* protection model, which aims to anticipate risks in advance, to mitigate them and avoid violations of individuals'

[19] N. Saphra,L. Weru, M. Shah, 'Tech offers promise to help yet too often perpetuates ableism, say researchers. It doesn't have to be this way' (2024) The Harvard Gazette.

[20] C.W. Land, 'Disability Bias & New Frontiers in Artificial Intelligence', *JTPD*, (2020) 28-42

fundamental rights and freedoms, promoting responsible, sustainable, and inclusive AI.

Following this approach risks must be detected and analysed, so that appropriate mitigation measures may be defined and implemented. Only if the residual risks are acceptable, the system should be made available to its users.

In this perspective, two are the main ways of managing risks related to AI systems: the impact assessment procedure and the design and AI training

EU regulatory framework on personal data protection and technological devices relies on impact assessment to analyse and mitigate risks and identify measures to be taken in case of their materialisation (see GDPR requires a *Data Protection Impact Assessment* (DPIA) in section 3, artt. 35 and 36; the MDR mandates a *risk management system* in art. 10, section 3, Annex I); the AI Act requires a *fundamental rights impact assessment* (FRIA).[21]

In relation to design and training of AI systems, both the AI Act and the UNCRPD impose obligations aimed to ensure that technologies are not only technically robust, but also socially and ethically aligned with human rights standards.

In line with Article 4(g) of the UNCRPD, States are obliged to promote research, the development and the accessibility and affordability of assistive technologies. Crucially, the principle of universal design – as established in Articles 9, 20, 21 and 26 of the UNCRPD – demands that AI services be accessible from the outset, rather than retrofitted post-development.

5. Conclusions.

The intersection of AI and disability highlights the pivotal role of inclusive design for the protection of the rights of persons with disabilities. Legal frameworks—both international and European—are committed to safeguarding fundamental rights and prevent exclusion and discrimination. Assessments of the impact of technologies and AI on fundamental rights—such as EU Data Protection Impact Assessments (DPIAs) and Fairness Risk Impact Assessments (FRIAs)—offer proactive means of evaluating and mitigating potential risks for persons with disability. Moreover, the active involvement of persons with disabilities throughout the design, development, and testing of AI technologies can help ensure that these systems are both trustworthy and equitable. Ethical and legal governance can contribute to ensure that AI application is inclusive, so that persons with disability fully participate in the benefits delivered by AI, while being protected from harm and discrimination.

[21] L Gatt, I A Caggiano, M C Gaeta, E Troisi, R Savella, R Trasarti, F Pratesi, 'FRIA implementation model according to the AI Act' (2024) EJPLT, 192-204.