**Child‑Specific DPIA - LexiTutor AI Reading Companion (Module 3)**

**1. System Description & Purpose**

**LexiTutor** is an AI-powered reading companion used in Year 5 (ages 9–11), focused on multilingual classrooms. It records students reading aloud and provides feedback on pronunciation, pace, and tone. It flags students who may need extra reading support. Weekly reports are generated for teachers and parents. The system is optional within a one‑classroom pilot involving students with and without special educational needs.

**2. Data Mapping & Legal Basis (GDPR Articles 6 & 9)**

| **Data Category** | **Purpose** | **Legal Basis Article 6** | **Special Category (Art 9)?** |
| --- | --- | --- | --- |
| Voice recordings | Pronunciation feedback | Public interest | No |
| Reading pace, tone metadata | Personalisation of feedback | Public interest | No |
| Flags for extra support | Teacher intervention planning | Public interest | No |
| Special needs / SEN status | Tailored recommendations | Public interest | Yes (health/disability) |
| Weekly progress reports to parents | Communication of support and progress | Public interest | No |

**3. Risk Assessment**

**Privacy & Surveillance Risk**

* *Risk*: Speech recordings may expose personal identity or sensitive attributes.
* *Likelihood*: Medium
* *Severity*: Medium

**Fairness & Bias Risk**

* *Risk*: AI may misinterpret accents or speech patterns from multilingual or neurodivergent students, leading to incorrect flags.
* *Likelihood*: High
* *Severity*: High

**Child Rights & Autonomy Risk**

* *Risk*: Students may not understand they are being recorded or evaluated by AI, affecting informed consent.
* *Likelihood*: Medium
* *Severity*: Medium

**4. Mitigation Measures (Technical & Organisational)**

**Technical Safeguards**

* Voice data anonymised and pseudonymised immediately after analysis.
* Secure encrypted storage within EU servers.
* Automatic deletion of raw recordings after 30 days.
* Accessibility features (language-neutral analysis, accent fairness).

**Organisational Measures**

* Training for teachers on use of LexiTutor and recognition of false positives.
* Age‑appropriate briefing to students; consent forms for parents with plain‑language overview.
* Named oversight lead (Digital Safeguarding Officer) responsible for monitoring.
* Appeal/report mechanism: Teachers review flagged cases; parents can request review.

**5. Residual Risk & Go/No‑Go Decision**

**Conclusion**: With the above safeguards in place, the **residual risk is considered acceptable**. The system can proceed under **strict pilot conditions** with follow-up evaluation. Annual DPIA review recommended before broader rollout.

**6. Stakeholder Feedback**

* **Parent Representatives**: Expressed concern about storage duration and learning disability profiling. Mitigation includes clear opt-out and data retention policies.
* **Student Council**: Highlighted desire for control over voice data; policy updated to include student-able request to delete individual recordings.