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

**AI System Name:** *LexiTutor*  
**Module:** *3 - AIGO Training*  
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**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, analyzes their pronunciation, pace, and tone, and generates personalized feedback. The system flags students who may need additional support and creates weekly reports for teachers and parents. A pilot is being conducted in a single classroom. Participation is optional, and some students have special educational needs.

**2. Purpose of Processing**

* To provide real-time feedback on students’ reading fluency and pronunciation
* To support teachers in identifying students who may require extra help
* To deliver tailored reports to parents and support home-school engagement
* To adapt reading materials based on student performance trends

**3. 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 (Art. 6(1)(e)) | 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 (Art. 9(2)(g)) |
| Weekly progress reports to parents | Communication of support and progress | Public interest | No |

**4. Necessity and Proportionality Assessment**

* Only data strictly necessary to deliver AI reading support is collected.
* Raw voice data is anonymised post-analysis.
* The system offers learning support that cannot be provided at scale otherwise.
* Non-intrusive alternative methods (e.g., teacher-only observation) are less scalable.
* Pseudonymisation and data minimisation are applied wherever possible.

**Privacy and Surveillance Risk**

* **Risk**: Speech recordings may reveal sensitive identity attributes
* **Likelihood**: Medium
* **Impact**: Medium
* **Mitigation**: Encrypted storage; deletion after 30 days; voice data pseudonymisation

**Fairness and Bias Risk**

* **Risk**: System may misclassify students with accents, disabilities, or neurodivergence
* **Likelihood**: High
* **Impact**: High
* **Mitigation**: Inclusive training data; staff training on false positives; human review for all flags

**Child Rights Risk**

* **Risk**: Children may not understand data processing implications
* **Likelihood**: Medium
* **Impact**: Medium
* **Mitigation**: Age-appropriate briefings; clear opt-out for parents and students; child-friendly explanations

**5. Safeguards**

**Technical Measures**

* Voice data pseudonymised post-analysis
* Automatic deletion of raw recordings after 30 days
* All data encrypted at rest and in transit
* Hosted on GDPR-compliant EU servers
* Algorithm tested on multilingual and neurodiverse data

**Organisational Measures**

* Training provided for teachers on ethical AI use
* Oversight by Digital Safeguarding Officer
* Complaint/appeals process established
* Students informed of their right to request deletion of individual recordings
* Regular audits and DPIA updates planned annually

**6. Stakeholder Consultation**

* **Parent Representatives**: Concerns raised about profiling and retention; mitigated by opt-out policies and transparent retention schedule
* **Student Council**: Requested autonomy to delete personal recordings; system updated to allow student-initiated deletion requests
* **SEN Coordinators**: Confirmed tool is complementary to current support practices

**7. Summary of Residual Risk**

Residual risk after mitigation is **low to moderate**. Given the safeguards, human oversight, and opt-out provisions, the pilot is **approved under strict conditions**, with a recommendation for:

* Continuous monitoring of bias
* Year-end impact evaluation
* Mandatory review prior to wider rollout