Sample DPIA template

This template is an example of how you can record your DPIA process and outcome. It follows the process set out in our DPIA guidance, and should be read alongside that guidance and the Criteria for an acceptable DPIA set out in European guidelines on DPIAs.

You should start to fill out the template at the start of any major project involving the use of personal data, or if you are making a significant change to an existing process. The final outcomes should be integrated back into your project plan.

Step 1: Identify the need for a DPIA

Explain broadly what project aims to achieve and what type of processing it involves. You may find it helpful to refer or link to other documents, such as a project proposal. Summarise why you identified the need for a DPIA.
Our school is considering a pilot of a tool called LexiTutor to support reading development in Year 5, multilingual classrooms. The need for this DPIA is based on the following: 1. LexiTutor records voice samples of students reading aloud. Student voices are a special category use of data 2. GDPR requires a DPIA for special category data 3. LexiTutor provides feedback on pronunciation, pace, and tone and flags students who might need extra support. If these data are used to make educational decisions about students, they would be considered high risk and require a DPIA. 4. LexiTutor stores user data to personalize reading materials over time. How and for how long those data are stored represents a potential risk to the rights and freedoms of students.

Step 2: Describe the processing

Describe the nature of the processing: how will you collect, use, store and delete data? What is the source of the data? Will you be sharing data with anyone? You might find it useful to refer to a flow diagram or other way of describing data flows. What types of processing identified as likely high risk are involved?

Data Collection:
* Recordings of student voices during reading sessions will be collected in the Lexi Tutor application.
* Student reading scores that reflect reading accuracy, pace, and tone
* Student identification data that matches students with their scores, including age, school year, languages spoken

Data Sources:
* Primary: collection of data directly from Year 5 student users while they are using the platform
* Secondary: Teacher or SIS input for class roster and basic demographic information

Data Use:
* Real-time analysis of voice recordings used to provide student user feedback
* Use of data to generate recommendations for reading support based upon student progress
* Use of data to generate recommendations for reading materials based on student interest
* Potential use by educators to support educational decisions and tiered support

Data Storage:
* Voice recordings stored on LexiTutor servers located in the United States
* Student progress data stored in LexiTutor student profile
* Voice recordings & reading performance data

Data Sharing:
* Data will be shared with each student's current educators for the purpose of educational assessment
* Data will not be shared with any third party per vendor contract

Data Deletion:
* Voice recordings stored until the conclusion of the pilot on September 30th.
* Performance data will be stored as long as the student is enrolled and/or the school has a partnership with LexiTutor, whichever comes first.

Describe the scope of the processing: what is the nature of the data, and does it include special category or criminal offence data? How much data will you be collecting and using? How often? How long will you keep it? How many individuals are affected? What geographical area does it cover?

Nature of the Data:
* Special category data includes student voice recordings, which have biometric identifiers
* Personal data, which includes student names, teacher/class assigned, year in school
* Performance, which includes scores for reading accuracy, reading pace, reading pronunciation, and progress monitoring data
* Educational data, which includes reading recommendations that have been personalized to the student, and any needs for additional support that have been flagged by the application.

Special Category/ Criminal Offense Data:
* Special category data- Yes. Voice recordings are special category data under GDPR because they are biometric data, which can be used to identify individual students
* Criminal Offense Data- No. No criminal offense data are included

Volume and Frequency:
* There are 105 Year 5 students involved in the LexiTutor pilot.
* Each week, LexiTutor will collect at least two and as much as 3 voice recordings per student.
* Vice recordings will be no more than 3 minutes long
* Total estimated data volume: We estimate roughly 90 minutes of recordings per student during the 9 week pulot

Retention Period:
* Voice recordings will be deleted at the conclusion of the pilot on September 30th.
* Performance data will be stored as long as the student is enrolled and/or the school has a partnership with LexiTutor, whichever comes first.

Individuals Affected:
* 105 students and 4 educators are participating in the pilot
* Parents and caregivers are aware of the pilot and have opted in, though they are not participants in the pilot

Geographic Area:
* ~~LexiTutor is being used at Greenbriar Intermediate School, 1212 Pilot Way, Anywhere, MT 84101~~
* Data is being stored on servers located in Anywhere, CO, USA.

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Describe the context of the processing: what is the nature of your relationship with the individuals? How much control will they have? Would they expect you to use their data in this way? Do they include children or other vulnerable groups? Are there prior concerns over this type of processing or security flaws? Is it novel in any way? What is the current state of technology in this area? Are there any current issues of public concern that you should factor in? Are you signed up to any approved code of conduct or certification scheme (once any have been approved)?

Nature of Relationship w/ Individuals
* Our school is in a position of trust and authority as an educational institution processing data of minor students. This could reflect an imbalance of power because the school is offering this as a solution to an academic need and students not participating could potentially be at a disadvantage.

Individual Control
Parents can opt their child out of participation in the pilot and our team will create alternative methods to ensure students who opt out of the pilot are not at an academic disadvantage.

Reasonable Expectations:
Digital learning tools are common in our school, however, using student's voice recordings to analyze speech patterns is beyond how edtech tools are currently being used in our school, which requires additional communication with families and oversight by our team.

Vulnerable Groups: Yes. Children are protected under GDPR and the EU AI Act. Multilingual learners may encounter additional vulnerabilities if LexiTutor misinterprets accented speech or communication patterns. We have worked with LexiTutor to ensure data reflects multilingual students.

Current State of Technology:
The combination of voice biometric analysis for educational assessment in multilingual contexts, especially those to influence educational support represents technology that is emerging. Speech recognition technology thus far shows documented bias against non-native speakers and research on edtech and impact, especially for vulnerable populations is nascent at best.

Codes of Conduct: No, we are not currently signed up for any Code of Conduct or certification "schemes."

Describe the purposes of the processing: what do you want to achieve? What is the intended effect on individuals? What are the benefits of the processing – for you, and more broadly?

Goals:
Ultimately, we want to enhance reading capability and support for Year 5 multilingual students by providing personalized feedback and earlier detection of reading needs. Our goal is to identify students who would benefit from specific supports as early in their learning process as possible through tailored guidance around pronunciation and reading fluency.

Intended Effect for Students:
* Improved reading confidence and interest in ready
* Enhanced fluency and pronunciation
* Early intervention support before a student becomes frustrated with reading
* Reduced anxiety about reading out lud in class
* Higher engagement due to higher interest reading materials

Intended Effect for our School:
* Objective assessment data to complement teacher expertise and observations
* Early reading support for students needing early intervention
* Data evidence that reflects impact of reading program effectiveness
* Enhanced ability to support our multilingual learners

Additional Potential Benefits:
* Pilot allows for us to learn and measure impact and anticipate challenges before deploying LexiTutor at scale

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Step 3: Consultation process

Consider how to consult with relevant stakeholders: describe when and how you will seek individuals' views – or justify why it's not appropriate to do so. Who else do you need to involve within your organisation? Do you need to ask your processors to assist? Do you plan to consult information security experts, or any other experts?

Consultation: When & How:
* Pre-Pilot Phase:
We will share intro letter with parents and students with opportunity to opt out and informing them of their right to understand and influence how student data is processed. Any non-replies will be treated as "opt-out." We will hold virtual information sessions to provide more information about the pilot and LexiTutor. We will ensure any correspondence is available in multiple languages.

Classroom teachers of Year 5 students will preview LexiTutor with students and explain how it works and why we are piloting it with the students themselves.

At the pilot mid-point and conclusion, we will offer both in person and virtual opportunities to offer feedback and our Data Protection Officer will be the point of contact for any questions or concerns throughout the pilot.

Additional Involvement within the Organization:
Data Protection Officer: Lead for AI compliance review
IT Team: Monitoring of LexiTutor and ongoing security assessment
Educators: Inform and provide guidance on implementation
School Leadership Team: Strategic oversight, resource allocation decisions
Special Education Educator or Coordinator: Inform and guide inclusive design and needs identification process in collaboration with teaching staff.
Vendor (LexiTutor): Clarify algorithmic bias testing, data retention polices and security measures, and establish clear agreements around data processing and breach notifications

Step 4: Assess necessity and proportionality

Describe compliance and proportionality measures, in particular: what is your lawful basis for processing? Does the processing actually achieve your purpose? Is there another way to achieve the same outcome? How will you prevent function creep? How will you ensure data quality and data minimisation? What information will you give individuals? How will you help to support their rights? What measures do you take to ensure processors comply? How do you safeguard any international transfers?

Lawful Basis for Processing?
* Primary: Consent from parents/caregivers as legal representatives (Article 6, GDPR)
* Special Category Data: Explicit Consent for voice recordings (Article 9 GDPR)
*Additional: (Article 6) Explicit use for educational purposes
*Child-specific: Age-appropriate information shared with students and they can opt out at any time during the pilot (Article 8 GDPR)
Achieve Purpose?
Yes, though will need to have human oversight to avoid specific limitations and dependencies.
* Voice analysis has the capability to objectively measure reading fluency and pronunciation, but we will have to evaluate if it can do that effectively for all learners
* Pattern recognition capability means we may be able to identify reading needs earlier
How to ensure quality data?
* Human oversight will allow for monitoring of algorithmic accuracy and realization of achieved purpose for all students
* Pilot success metrics will include metrics tied to learning outcomes as well as technical functionality
Alternative Assessment Methods?
* Traditional educator assessments
*Non-AI digital tools like Lexia or other that do not include a voice analysis or biometric processing
* Peer reading opportunities
Preventing "Function Creep"?
*Technical: Ensure limitations of data processing, storing, and distribution are included w/in data processing agreements
* Governance: Regular review of data use against intented purpose and educator review of LexiTutor outputs compared with classroom performance
*Staff training on how to use insights generated by LexiTutor

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Step 5: Identify and assess risks

Describe source of risk and nature of potential impact on individuals. Include associated compliance and corporate risks as necessary.	**Likelihood of harm**	**Severity of harm**	**Overall risk**
1. LexiTutor records voice samples of students reading aloud. Student voices are a special category use of data 2. LexiTutor provides feedback on pronunciation, pace, and tone and flags students who might need extra support. If these data are used to make educational decisions about students, they would be considered high risk 3. LexiTutor stores user data to personalize reading materials over time. How and for how long those data are stored represents a potential risk to the rights and freedoms of students 4. Potential risk of algorithmic bias against multilingual students or those with accents 5. Power imbalance in school setting	Remote, possible or probable 1. Probable 2. Probable 3. Probable 4. Probable 5. Probable	Minimal, significant or severe 1. Severe 2. Significant 3. Minimal 4.Severe 5. Significant	Low, medium or high 1. High 2. High 3. Medium 4. High 5. High

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Step 6: Identify measures to reduce risk

Identify additional measures you could take to reduce or eliminate risks identified as medium or high risk in step 5				
Risk	**Options to reduce or eliminate risk**	**Effect on risk**	**Residual risk**	**Measure approved**
See above 1. 2. 3. 4. 5.	1. In vendor agreement, ensure limits to how long vendors retain data (no more than 30 days), and include specific requirements for student data privacy, provide professional learning for faculty on how to keep student data safe online, ensure vendors review and update security certifications annually and have incident response procedures in place with clear communication protocols should a problem arise. 2. Establish a documented teacher review process, with teachers making all decisions and AI serving in an advisory capacity. Ensure teachers have training necessary to evaluate AI responses. Provide transparent explanations about LexiTutor, how it works, what data it collects, etc. with parents and students in intro letter Establish an appeals process with reasonable timelines for resolution for any student or family wishing to appeal placement or feedback from LexiTutor. 3. Data processing agreement with vendor includes student data is only kept for 30 days, only collects information directly related to student reading interests and fluency, and can be deleted if requested by the school or family. Additionally, the agreement specifies that student data will not be used to train the model. 4. Professional learning on AI bias and strategies for mitigating it will be provided to all teachers and school leadership. Teachers will have alternate assessments available for any student who opts out. Grade 5 teachers will include review of student data in their weekly PLC meetings during the pilot. The DPO will attend those meetings. 5. Clear opt out opportunities for students with careful attention paid by teachers to alternatives. Teachers will anonymously survey students and parents at least twice during the pilot to gather input and feedback. Post-pilot debrief and decision making based upon data and feedback from stakeholders.	Eliminated reduced accepted Reduced Reduced Reduced Reduced	Low medium high Low-medium Low Low Low-medium Medium	Yes/no

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Step 7: Sign off and record outcomes

Item	Name/date	Notes
Measures approved by:		Integrate actions back into project plan, with date and responsibility for completion
Residual risks approved by:		If accepting any residual high risk, consult the ICO before going ahead
DPO advice provided:		DPO should advise on compliance, step 6 measures and whether processing can proceed
Summary of DPO advice: Weekly reports submitted during pilot phase Reconvene in 6 months to assess effectiveness and plan		
DPO advice accepted or overruled by:		If overruled, you must explain your reasons
Comments:		
Consultation responses reviewed by:		If your decision departs from individuals' views, you must explain your reasons
Comments:		
This DPIA will kept under review by:		The DPO should also review ongoing compliance with DPIA

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