

EU AI Act Article 13 Compliance Document

Document Version: 1.0

Last Updated: [Date]

Approved By: [School Leadership Team]

Review Date: [Date + 2 weeks]

System Name and Purpose

Name: LexiTutor

Purpose: LexiTutor is an AI-powered tool designed to improve reading capability and support for Year 5 multilingual students by analyzing voice recordings and providing feedback on pronunciation, pace, and tone. This tool connects students who many need additional reading support, with early intervention and support.

Classification: High- risk under EU AI Act given that it is being used by minors and processes biometric data.

Intended Users and Context

- Year 5 classroom teachers and students

Acceptable Use Context

- Reading assessment sessions during class time
- Individual student progress monitoring
- Early intervention planning and support
- Personalized recommendations of learning material
- Teacher professional learning and training on reading support

Prohibited Use Context

- High-stakes academic decisions- LexiTutor is not for final grades or promotion decisions without human oversight
- Standalone assessment- Must always be combined with the professional judgement of the teacher
- Surveillance- Not for general monitoring other than educational assessment

System Logic and Functioning

How LexiTutor Works

LexiTutor processes student voice recordings through the following steps:

1. **Voice Data Collection:** Students read aloud during structured reading sessions. Voice recordings are captured within the LexiTutor application (maximum 3 minutes per session).
2. **Biometric Analysis:** The system analyzes speech patterns, pronunciation accuracy, reading pace, and tone using voice recognition technology designed for multilingual learners.
3. **Pattern Recognition:** Advanced algorithms compare student performance against age-appropriate reading benchmarks while accounting for multilingual backgrounds and accent variations.
4. **Feedback Generation:** The system produces:
 - Real-time pronunciation corrections
 - Reading pace recommendations
 - Personalized reading material suggestions
 - Early intervention alerts for teachers
5. **Progress Tracking:** Student performance data is stored in individual profiles to track improvement over time and identify learning trends.

Data Processing

- **Input Data:** Voice recordings, student identification data, reading scores, teacher observations
- **Processing Location:** Secure servers in the United States with GDPR compliance measures
- **Output Data:** Performance analytics, recommendations, progress reports
- **Integration:** Connects with existing school information systems

Limitations and Risks

Technical Limitations

- Language Bias- System may misinterpret pronunciation that is common in multilingual learners as errors
- Background Noise- Performance not as good in classrooms that have a lot of background noise
- Accuracy rates: Voice analysis rates are slightly lower for heavily accented speech patterns

Educational Risks

- Overreliance: Teachers may become too dependent on AI recommendations rather than using their professional judgement
- Labeling Risk: Students may be inappropriately categorized as needing additional support
- Privacy: Voice recordings include biometric data which can be misused if security is breached.

Current Mitigation Strategies

- Teacher training on the tool and its limitations
- Clear process in place to include human review of all AI recommendations
- Secure data storage with encryption
- Regular review of trends in data to red flag algorithmic bias

Human Oversight

All AI-generated recommendations to be reviewed by teachers before implementation.

- Teachers will review all AI feedback before sharing with students
- Weekly PLC meetings teachers evaluate AI recommendations against their own assessment of students
- Monthly review of AI insights and performance for the duration of the pilot
- Teachers should override AI recommendations when their professional judgement indicates different student needs

Special Warnings

Do not use LexiTutor data for:

- High-stakes academic decisions- LexiTutor is not for final grades or promotion decisions without human oversight
- Standalone assessment- Must always be combined with the professional judgement of the teacher
- Surveillance- Not for general monitoring other than educational assessment

Contact Information

Technical Issues: IT Support Team - [contact info]

Educational Concerns: Reading Specialist Coordinator - [contact info]

Privacy Questions: Data Protection Officer - [contact info]

General Inquiries: School Administration - [contact info]

GDPR Info Sheet for Parents and Caregivers- LexiTutor

Our school has recently purchased a temporary licence for a program called **LexiTutor**. The program is designed for students aged 9 to 11 in multilingual classrooms. It will be **piloted in Year 5 classrooms** for the 2025-2026 school year. The reason we selected this tool is because of the way it personalizes reading materials to each student's interests and reading level. Based upon our research, **we believe this tool, in partnership with the direct instruction, coaching, and ultimate decision-making of our educators, will help us provide better support to student's reading fluency and desire to read.**

The tool does the following:

- Uses artificial intelligence to analyze reading patterns and provide recommendations
- Records voice samples of students reading aloud, which will be reviewed by each child's classroom teacher
- Provides feedback on pronunciation, pace, and tone to the student in real time
- Flags students who might need extra support, with daily oversight by their classroom teacher
- Stores information like student name, reading preferences, voice recordings, and reading level to personalize reading materials.
- Offers weekly reports to teachers and parents, which are reviewed by classroom teachers.

Our school is implementing the following safeguards to protect student data privacy:

- Conduct a Data Protection Impact Assessment to evaluate and mitigate any potential risks associated with this tool.
- Weekly convenings of the Year 5 teaching team to evaluate the tool's recommendations against their knowledge of the student.
- Signed a contract with LexiTutor that prohibits the selling of student data or its use to train future models of LexiTutor. It also prohibits storing student data outside of the EU or beyond the pilot duration, with all data deleted immediately upon completion (June 2026).
- Quarterly focus groups with students and families to get feedback on the user experience with the tool.

Please know you have the right to opt your child in or out of this pilot. You and your student also have the right to access, correct, or request deletion of personal data. You will be receiving communication from your child's teachers with information about how to do so.

Questions: Please contact AI Governance Officer Julie Foss at julie@schoolemail.com or (xxx) xxx-xxxx.

Stakeholder Communication Plan

	Staff	Families	BOE
What matters to this group?	That they have the support to integrate LexiTutor into their instruction and that it benefits student learning outcomes.	That their children's rights, privacy, and data will be protected.	That the school is balancing innovating learning opportunities for students while managing risk for stakeholders and the school.
Key messages	<ul style="list-style-type: none"> What we want to learn during the pilot What LexiTutor is, what it does, and why it is being piloted Alternative learning options need to be made available for those opting out Contact info for questions and concerns 	<ul style="list-style-type: none"> Rights and responsibilities of students & families Risks associated with the tool Options available What LexiTutor is, what it does, and why it is being piloted Contact info for questions and concerns 	<ul style="list-style-type: none"> What LexiTutor is, what it does, and why it is being piloted Communication plan Compliance measures (DPIA) Pilot process Feedback shared from pilot participants Decision Framework at conclusion of pilot
When/ How Communication will Occur	Led by school principal at beginning of the year and for the duration of the pilot	Led by teachers at the beginning of the year and for the duration of the pilot	Shared by the school principal in anticipation and at the conclusion of the pilot.
Planned Activities	<ol style="list-style-type: none"> Monthly PLC sessions for Year 5 teachers to calibrate and work through problems of practice for the duration of the pilot Year 5 Team training at the start of the school year Feedback gathering sessions 3x/ pilot 	<ol style="list-style-type: none"> Back-to-School Night Overview and sandbox opportunity to engage in a LexiTutor demo outside of Year 5 classrooms Video overview and GDPR Info Sheet sent to all Year 5 families 	<ol style="list-style-type: none"> Board packet includes GDPR Info Sheet, high-risk documentation and Pilot Plan w/ Principal available to field questions during Board meeting Board members invited to Back-to-School night and/or student launch of LexiTutor

README.md

I created a series of resources to transparency around AI systems being used in school. This matters for establishing and building trust and approaching the use of AI in schools as something that requires all of us to implement in a way that is responsible and for the good of those in our care.

Article 13 compliance is achieved through detailed system descriptions, clear limitations, and specific human oversight protocols that educators can follow daily. **Articles 51-52 support** exists through the comprehensive risk warnings and quality management procedures, including regular bias monitoring and systematic review requirements. **GDPR Articles 12-14 alignment** appears in the accessible language, clear data subject rights explanations, and transparent processing descriptions.

I think what this artifact solidified most for me was the idea of AI implementation as a team sport. It also illuminated the shift folks will see in their school based roles and how we will need to pair responsibilities around AI governance with permission to let go of other things.

I think the ongoing challenge is helping people find agency in compliance.