Lexito

Data Protection Impact Assessment

Supplier information for schools and trusts

This document gives a school or trust the information it needs to complete a data protection impact assessment (DPIA) for Lexito. It follows the structure of the ICO's DPIA template, so each section can be used to complete the matching part of the school's own assessment.

System
Lexito, AI-assisted marking for language teachers

Supplier
ExtraDay Solutions Ltd

Role
Data processor for the school or trust

Date
November 2026

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1. Summary

Lexito helps secondary school language teachers mark pupils' handwritten written work. A teacher photographs a pupil's answer, checks an exact typed copy produced by AI, then reviews and approves AI-drafted marks and feedback against the school's own mark scheme.

Users	Teachers only. Pupils do not log in, have no accounts and do not interact with the system or the AI.
Decisions	Every mark is reviewed and approved by a teacher. The AI produces drafts, and no mark exists until a teacher approves it.
Pupil identity	Pupils' names are not collected or stored. Work is held against a code chosen by the teacher, such as "07".
Photos	Encrypted while stored and deleted when the teacher approves the marks, or after 7 days at the latest.
Retention	Typed copies, marks and feedback are deleted automatically at the end of a period set by the school, from 30 days to 2 years.
AI training	Pupils' work is not used to train AI models, by ExtraDay Solutions Ltd or by its AI provider.
Hosting	The application and database are hosted in London. AI processing is carried out by Anthropic under its commercial terms.

2. How a school uses Lexito

Lexito is introduced by a school's languages department as a support aid for marking and assessment, usually beginning with a trial.

What it is used for	Marking pupils' handwritten work in languages, such as GCSE and A-level trial examinations and assessed writing tasks, against the department's own mark schemes for each task.
Formative assessment	Alongside marks, Lexito drafts feedback under the department's own headings, such as strengths, improvements and targets, with each error explained. Teachers review this feedback and pass it on to pupils, so the same process supports formative assessment as well as trial examinations.
Staff access	The department's Lexito admin adds each teacher from within the app and gives them a personal access code, so there are no passwords to manage and no software to install. Each teacher sees only their own marking.
Support and oversight	Nominated IT or AI colleagues can be given admin access to support and oversee the system. Admins manage staff accounts and access, retention settings, data export and deletion, and can see anonymous figures showing how often teachers change the AI's marks. Admin access does not include viewing individual teachers' marking in the app, which keeps pupils' work visible only to their own teacher.

Final judgements	Lexito is a support tool and does not replace professional judgement. Every transcription is checked, and every mark approved, by the teacher, who remains responsible for final marks and grades. The department's usual exam board training, moderation and quality assurance continue alongside it. The optional "mark first, then compare" mode, where the teacher records their own mark before seeing the AI's draft, gives the department a clear measure of agreement during a trial.
Costs	Trials are available, and terms are agreed with each school. No payment details are needed for a trial.

3. Why a DPIA is appropriate

Lexito processes images of pupils' handwritten work and the content of their answers. Although names are excluded, handwriting and written content can sometimes identify a pupil, so this information is treated as personal data about children. The processing also uses a new technology, generative AI. The ICO and the Department for Education recommend a DPIA for processing of this kind, and Lexito has been designed to support one.

4. Nature of the processing

How a piece of work is processed

1 Capture The teacher photographs one pupil's answer, up to 4 photos per answer, in the Lexito web app on a phone or computer. Before sending, the app prompts the teacher to cover or crop out any name with a built-in tool.	**Data:** the image is resized and re-saved on the device, which removes embedded metadata such as location and camera details. It is sent over an encrypted connection, re-processed on the server to remove metadata again, then encrypted and stored.
2 Transcription The image is sent to the AI service, which returns an exact typed copy of what the pupil wrote. Spelling, accent and grammar mistakes are kept, because they are what is being assessed. Words the AI is unsure of are flagged.	**Data:** the image is processed by Anthropic. The AI is instructed to omit names, candidate numbers and class details, and to replace any person's name in the text with [name].
3 Teacher check The teacher compares the typed copy with the photo, corrects any misreading, and confirms it. The app warns the teacher if a name from their own pupil list appears in the text.	**Data:** the confirmed copy is saved against the pupil's code.

4 Draft marking

The confirmed copy is marked against the school's mark scheme and the task question. The AI drafts a mark for each criterion, a list of errors with corrections, and feedback under the school's own headings.

Data: only the typed copy, the mark scheme and the question are sent. The marking stage never receives the image.

5 Teacher approval

The teacher reviews the draft, changes any mark, correction or comment, and approves it. The approved marks and feedback become the record, which the teacher can copy, print or export.

Data: the image is permanently deleted at the moment of approval. The marks and feedback are kept for the school's chosen retention period.

Example of a typed copy as the teacher sees it at the checking stage (illustrative, not real pupil work):

> Me llamo [name] y tengo quince años. El fin de semana pasado ~~va~~ voy al cine con mis amigo. Mi hermana es muy simpático y divertida.

The pupil's mistakes are kept, crossed-out text is shown struck through, the name has been replaced, and the highlighted word is one for the teacher to check.

Source, collection and storage

- **Source:** pupils' written work in the classroom, photographed by their teacher. No data is collected from pupils directly.
- **Storage:** a PostgreSQL database hosted in London. Images are encrypted by Lexito before they are written to the database.
- **Sharing:** data is shared only with the sub-processors listed in section 10, solely to provide the service.
- **Deletion:** automatic, as set out in section 5. Schools can also delete individual scripts, whole marking sets or all their data at any time.

5. Scope of the processing

Individuals concerned

- **Pupils** whose written work is marked: secondary pupils, including KS4 and KS5 (sixth form) students.
- **Teachers and staff** who use the system.

Personal data processed

Data	Description	Retention	Access
Images of work	Up to 4 photographs of a pupil's answer, with metadata removed. Encrypted at rest.	Deleted on teacher approval, or after 7 days if not approved.	The teacher who uploaded them.

Data	Description	Retention	Access
Typed copies	The text of the pupil's answer, linked to a pupil code, task title and optional class label such as "11B".	School's chosen period: 30 days, 3 months, 6 months, 1 year (default) or 2 years.	The teacher who marked it. The school's admin can export it.
Marks and feedback	Marks per criterion, total, grade where the school sets boundaries, corrections and written feedback.	As typed copies.	As typed copies.
Pupil names	Optional, added by a teacher to recognise their pupils' codes.	Never sent to Lexito. Stored only in the browser on that teacher's own device.	That teacher, on that device.
Teacher account data	Name, work email, role, login and session records.	While the school uses Lexito. Deleted with the school's data.	The teacher and the school's admin.
Activity log	Records of uploads, approvals, deletions and exports, with the staff member and time. Contains no pupil work.	Deleted with the school's data.	ExtraDay Solutions Ltd, for security and support.
Accuracy figures	The AI's total mark and the teacher's final total, as numbers only, with no link to a pupil or script.	Deleted with the school's data.	The school's admin, and ExtraDay Solutions Ltd in aggregate.
Mark schemes	The structured mark scheme drafted from the school's uploaded documents. Uploaded files are read in memory and never stored.	Until the school removes it. Earlier versions are kept so past marking can be traced.	Teachers at that school only.

Special category data

Lexito does not ask for or rely on special category data. A pupil's answer may occasionally mention information such as health or family circumstances, depending on the task set. This is handled as part of the work, is not extracted or analysed separately, and is subject to the same retention and deletion as all other content. Schools can reduce this further when choosing writing tasks.

Volume and frequency

During the trial, the written work of one teacher's classes. If extended, the written work of all MFL classes, typically one class set of around 25 to 30 answers per task, marked by the class teacher. The number of scripts each school can process is set by its licence.

Geographical scope

Schools in England and the wider UK. Data is stored in London. AI processing may take place outside the UK, as set out in section 10.

6. Context of the processing

- **Relationship with individuals:** the school already holds and assesses pupils' work as part of its normal educational role. Lexito supports a task teachers already carry out.
- **Control:** the school controls the processing. Teachers decide what to upload, check every transcription and approve every mark. School admins control retention, staff access, export and deletion.
- **Expectations:** pupils and parents would expect their work to be marked by their teacher. Lexito keeps the teacher as the decision-maker, and the school informs pupils and parents that AI assists with marking.
- **Children:** the data relates to children, so Lexito is built to minimise what is collected. Names are excluded, images are short-lived, and no profiles of pupils are created.
- **Pupil access:** pupils do not use Lexito. It is a staff-only tool and is not designed for or likely to be accessed by children.
- **Guidance:** Lexito's design follows Department for Education guidance on generative AI in education and on data protection in schools. That guidance asks schools to keep personal data out of AI tools where possible, to keep humans responsible for decisions, and to ensure pupils' work is not used to train AI without consent.

7. Purposes and benefits

The purpose of the processing is to help teachers assess pupils' written work in modern foreign languages, accurately and consistently against the school's own mark scheme, and to return useful feedback to pupils more quickly.

- **For pupils:** detailed, specific feedback, with each error explained and targets taken from the school's own feedback sheet.
- **For teachers:** less time spent transcribing and annotating, with the teacher's professional judgement kept for every mark.
- **For the school:** consistent feedback across classes using the department's own scheme, and anonymous figures showing how often teachers change the AI's marks.

8. Lawful basis and necessity

Lawful basis

The lawful basis is determined by the school as controller. Schools and academy trusts commonly rely on **public task** (UK GDPR Article 6(1)(e)) for the assessment of pupils' work, as part of their function of providing education. Consent is not required for Lexito to operate.

Necessity and proportionality

- **Data minimisation:** names are excluded at several stages, images are deleted as soon as marking is approved, and the marking stage receives text only.

- **Purpose limitation:** data is used only to provide marking support to the school. It is not used for training AI, for advertising, for profiling or for developing other products.
- **Accuracy:** two separate teacher checkpoints, one for the transcription and one for the marks, keep errors from becoming part of the record.
- **Storage limitation:** images are kept for 7 days at most, and other data for the period the school chooses, after which it is deleted automatically.
- **Transparency:** suggested wording for the school's privacy notice and for informing pupils and parents is available from ExtraDay Solutions Ltd.
- **Processor terms:** processing is carried out under a data processing agreement between the school or trust and ExtraDay Solutions Ltd, in line with Article 28 UK GDPR.

9. Use of AI and human oversight

AI models

Lexito uses Anthropic's Claude models through Anthropic's commercial API. A Claude Opus model transcribes the handwriting and a Claude Sonnet model drafts the marking. The models are not trained or fine-tuned on any school's data. Each request is processed independently, and the AI keeps no memory of pupils between requests.

How the AI is directed

- For transcription, the AI is instructed to copy exactly what was written without correcting it, to flag uncertain words, to ignore teachers' annotations and planning notes, and never to output a person's name.
- For marking, the AI is given the school's criteria, mark bands, feedback headings and target list, and is instructed to mark consistently against them.
- Anything written in a pupil's answer is treated as the pupil's work, never as an instruction, so content in an answer cannot change how the AI behaves.
- The AI returns its results in a fixed structure. The software checks every result before a teacher sees it: marks are held within each criterion's maximum, the total is calculated by the software, and only the school's own criteria are accepted.
- Grades are calculated from boundaries set by the school. Where none are set, any grade shown is clearly labelled as an estimate.

Human oversight and automated decision-making

No decision about a pupil is made solely by automated means, so Article 22 UK GDPR does not apply. A teacher reviews and confirms every transcription, and reviews, amends and approves every mark. Teachers can re-run the marking, return a script for a new transcription, edit or remove any correction or comment, and reopen an approved mark to change it.

Monitoring accuracy

- Lexito records how far teachers change the AI's total mark, as anonymous numbers, so each school can see how closely the drafts match its teachers' judgement.
- An optional "mark first, then compare" mode has the teacher enter their own mark before the AI's draft is shown, giving an unbiased measure of agreement.

- The same instructions and mark scheme are applied to every pupil's work. Pupils are not identified to the AI, and no profile of any pupil is built.

Intellectual property

Pupils' work and schools' mark schemes are used only to provide the service to that school. They are not used to train AI models, and a school's uploaded mark schemes are visible only to that school.

10. Processors and international transfers

ExtraDay Solutions Ltd acts as processor for the school and uses the following sub-processors. Each has its own data processing terms with ExtraDay Solutions Ltd.

Sub-processor	Service	Data	Location
Vercel Inc.	Hosting for the Lexito web application	All application data in transit	Application servers in London (UK)
Neon (Databricks)	Managed PostgreSQL database	Encrypted images, typed copies, marks, accounts	London (UK)
Anthropic PBC	AI transcription and draft marking	Images of work, typed copies, mark schemes	May include the United States

Transfers outside the UK

AI processing by Anthropic may take place outside the UK, including in the United States. Anthropic's commercial terms incorporate its data processing addendum, which provides safeguards for international transfers. Under these terms:

- data sent through the commercial API is not used to train Anthropic's models;
- Anthropic's published policy is to delete API inputs and outputs within 30 days;
- all data is encrypted in transit;
- pupils' names are excluded before any data is sent, and only the minimum needed for each task is sent: the image for transcription, and text only for marking.

11. Security measures

Area	Measures
Encryption	All connections use HTTPS, and browsers are instructed to always use a secure connection (HSTS). Images are encrypted by the application with AES-256-GCM before storage, and the database is encrypted at rest by the provider.

Area	Measures
Authentication	Every staff member has an individual account, and there are no shared logins or passwords. The school's admin adds each teacher in the app and issues them a personal access code, a long random code the admin can replace or switch off at any time. Codes and session tokens are stored only as one-way hashes, and sessions expire after 14 days.
Access control	Each teacher can access only their own marking. Colleagues, including the school's admins, cannot open another teacher's scripts. Each school can access only its own data and mark schemes. A school can have more than one admin, and removing a staff member or replacing their code ends their access immediately.
School gate	No pupil work can be uploaded until the school's admin has accepted the data processing terms in the app.
Application security	Requests from other websites are rejected, pages cannot be embedded in other sites, and pages and images of pupil work are never cached by browsers and are excluded from search engines. All inputs are validated, and every database query is limited to the signed-in teacher or school.
Logging	An activity log records uploads, approvals, deletions, exports and changes to settings. Error logs record what failed, not the pupil work involved.
Data in uploads	Uploaded mark scheme documents are read in memory and discarded. Only the structured scheme is kept. Teachers are prompted to remove any pages listing pupils before uploading.
Secrets	Encryption keys and service credentials are held in the hosting provider's secure environment settings, never in the application code.
Testing	Automated tests check that schools and teachers cannot access each other's data, that images are deleted on approval, that metadata is removed, and that marks stay within the scheme's limits.
Resilience	The database provider maintains a short point-in-time restore window for resilience. Deleted data is not recoverable once that window has passed.

12. Individuals' rights

Requests from pupils, parents or staff are handled by the school as controller, with ExtraDay Solutions Ltd providing any assistance needed.

- **Access and portability:** the school's admin can export all of the school's data from within the app as a structured file. A pupil's work is located by their code, which the teacher can match from their own records.
- **Rectification:** teachers can correct transcriptions before marking and can reopen and amend approved marks and feedback.

- **Erasure:** teachers can delete individual scripts or whole marking sets, and the school's admin can delete all of the school's data at any time.
- **Restriction and objection:** the school can stop using Lexito for any pupil's work at any time, and remove what has already been processed.
- **Automated decisions:** not applicable, as every mark is decided by a teacher.

13. Incidents and breaches

ExtraDay Solutions Ltd will notify the school without undue delay after becoming aware of a personal data breach affecting the school's data. The notification will include the information the school needs to meet its own duty to report to the ICO within 72 hours where required. ExtraDay Solutions Ltd will help the school contain and investigate the incident and keep it informed. Staff access can be removed immediately by the school's admin, and all data can be exported or deleted at any time.

14. Risks and measures

The risks below are assessed after the measures described are in place. Likelihood and severity use the ICO's scale: remote, possible or probable likelihood, and minimal, significant or severe harm.

Risk	Measures in place	Likelihood	Severity	Residual
A pupil is identified from a name visible in a photo or written in the text	Prompt and tool to cover names before upload; AI instructed to omit and replace names; automatic removal of name lines; warning if a known name appears; teacher checks every transcription; names never stored.	**Remote**	**Minimal**	**Low**
An inaccurate transcription or draft mark leads to an unfair assessment	Separate teacher check of every transcription; teacher approval of every mark; marks held within criteria limits; totals calculated by software; accuracy monitoring and "mark first" mode.	**Remote**	**Significant**	**Low**
Unauthorised access to pupil work by an outside party	Encryption in transit and at rest; application-level encryption of images; individual hashed credentials; session expiry; protection against cross-site requests and embedding.	**Remote**	**Significant**	**Low**

Risk	Measures in place	Likelihood	Severity	Residual
A member of staff sees work they should not	Each teacher can access only their own marking; school data fully separated; staff access removed immediately on leaving.	**Remote**	**Minimal**	**Low**
A teacher's phone or computer is lost	Images are not stored on the device by the app; access ends when the school removes the account; sessions expire; pupil names exist only on that device and are not linked to any server data without it.	**Possible**	**Minimal**	**Low**
Data processed outside the UK by the AI provider	Anthropic's data processing addendum and transfer safeguards; no training on data; deletion under Anthropic's retention policy; names excluded and only the minimum sent.	**Remote**	**Minimal**	**Low**
Pupils' work is used to train AI	Contractual commitment from ExtraDay Solutions Ltd; Anthropic's commercial terms exclude training on API data.	**Remote**	**Significant**	**Low**
Data is kept longer than necessary	Images deleted on approval or within 7 days; automatic deletion at the end of the school's retention period; uploaded documents never stored.	**Remote**	**Minimal**	**Low**
An answer contains special category information	Not requested or analysed; the same deletion applies; schools can choose tasks that avoid sensitive topics.	**Possible**	**Minimal**	**Low**
Staff rely on AI drafts without proper review	Approval is required for every script; teacher edits are expected and recorded; "mark first" mode; anonymous accuracy figures for the school.	**Remote**	**Significant**	**Low**
Content in a pupil's answer manipulates the AI	Answers treated as data, not instructions; fixed output structure checked by the software; teacher review.	**Remote**	**Minimal**	**Low**

Risk	Measures in place	Likelihood	Severity	Residual
Pupils and parents are not aware AI is used	Suggested privacy notice and parent wording supplied; the school informs families in line with DfE guidance.	**Remote**	**Minimal**	**Low**
The school cannot retrieve or remove its data at the end of the service	Full export and full deletion available to the school's admin at any time; obligations set out in the data processing agreement.	**Remote**	**Minimal**	**Low**

15. Supporting documents and contact

The following are available to the school or trust from ExtraDay Solutions Ltd on request:

- Data processing agreement between the school or trust and ExtraDay Solutions Ltd
- List of sub-processors
- Suggested wording for the school's privacy notice and for informing pupils and parents
- "How Lexito works" information sheet for senior leaders and staff

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ExtraDay Solutions Ltd
Questions about Lexito or this document:
archiefell@extradaysolutions.com

This document describes how Lexito processes personal data, to support the school's or trust's own data protection impact assessment. The school or trust remains responsible for its assessment and decisions as controller. The binding terms are set out in the data processing agreement.