

DATA PROTECTION IMPACT ASSESSMENT (DPIA)



V1.0/Autumn Term 2025

DATA PROTECTION IMPACT ASSESSMENT

Audience: UK School Staff Only (Teachers, Leaders – Not Pupils)

Date Completed: [Insert Date]

Completed by: [Insert Name / Role]

Reviewed by DPO: [Insert Name / Date]

This DPIA outlines how askKira.com handles personal data in UK schools. askKira is a secure AI-powered platform providing teacher tools, including marking support, lesson planning, communication, wellbeing support and professional dialogue. It processes user-generated queries and interaction logs. The aim is to ensure data is handled lawfully, fairly, and transparently while reducing risk to individuals' rights.

1. Scope and Description of Processing

- Data Subjects: Teachers, senior leaders, support staff (18+, professional use only).
- Data Types: Staff names, school emails, job roles, school name, usage metadata (login time, frequency), conversation transcripts.
- No pupil data is required or encouraged.
- Data entered only by authorised adult users with professional school emails.
- Used in UK schools and MATs for professional purposes only.

2. Purpose and Lawful Basis

- Purpose: Reduce staff workload, enhance teaching efficiency, support wellbeing, and provide AI-generated assistance for school-related queries.
- Lawful Basis:
 - Contract (Article 6(1)(b)) – to deliver the service to subscribed institutions.
 - Legitimate Interests (Article 6(1)(f)) – for anonymised analytics and insights (where opted-in).
- Special category data is not intentionally collected.
- The platform does not use data for marketing or profiling.

3. Nature of Processing

- AI-generated support for lesson planning, marking, SEND strategies, and wellbeing tools.
- All data processed securely, with session logs for functionality and safeguarding.
- Schools/MATs remain Data Controllers. askKira acts as Data Processor.

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4. Consultation

- Input from education professionals, DPO, and technical staff.
- School pilot feedback included in development.
- Sub-processors reviewed and under contract.
- Users agree to terms at sign-up and can access privacy details.

5. Risk Assessment and Mitigation

Risks Identified:

- Unauthorised access.
- Misuse of AI-generated content.
- Entry of sensitive data.

Mitigations:

- Secure login, UK-hosted infrastructure.
- Staff training materials provided.
- Reminders not to enter sensitive/pupil-identifiable data.
- Session logging with deletion policies.
- Data deleted within 30 days of contract termination; backups purged within 90 days.
- Low to medium residual risk under current controls.

6. Data Protection Principles

- **Lawfulness, Fairness, Transparency:** Clear explanations and accessible privacy policy.
- **Purpose Limitation:** Data used solely to support teaching/workload.
- **Data Minimisation:** Only essential staff data collected.
- **Accuracy:** Users review inputs and outputs.
- **Storage Limitation:** Data retained only as required (see retention policy).
- **Integrity & Confidentiality:** Encryption, role-based access, secure sub-processors.

7. Rights of Individuals

- **Access:** Staff can request their data.
- **Correction:** Users can amend inputs.
- **Deletion:** Staff may request erasure ("right to be forgotten").
- **Restriction:** Users can choose what data to input.
- **Portability & Objection:** Supported on request.

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8. International Transfers

- Primary hosting in UK (AWS London).
- In rare cases, processing may occur in the EEA/USA under UK–US Data Bridge and SCCs.

9. Subprocessors

askKira uses the following sub-processors, all bound by UK GDPR:

- Infrastructure: AWS (UK – London), Microsoft Azure.
- AI: OpenAI (API, no training on customer data), Google Gemini.
- Education Data Access: Wonde (MIS integration).
- Security/Performance: Cloudflare (DDoS protection).
- Analytics: Google Analytics (EEA), Hotjar (anonymised).
- Communications: Google Workspace, Mailchimp.
- Payments: Stripe (PCI-DSS compliant).
- Finance: Xero (accounting).

10. Outcome

- Data processing is proportionate, supporting staff workload and wellbeing.
- Risks are low/medium with mitigations in place.
- Aligned with DfE AI guidance (2025) and Ofsted AI findings (2024/25).

11. Ongoing Monitoring and Review

- DPIA reviewed annually or after significant changes.
- DPO to monitor updates and manage queries.
- Staff encouraged to raise concerns/feedback.

12. Additional Safeguards

- Platform does not directly interact with children.
- Schools retain controller role and oversee use.
- All data entry must comply with school safeguarding/data policies.
- askKira provides DPIA templates and support for schools to meet statutory requirements.
- Records of Processing Activities (Article 30) maintained by askKira.

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13. Cyber Security Standards

- Cyber Essentials certified.
- Regular penetration testing.
- Follows ISO 27001 principles for information security.
- Staff trained in data security.

14. Insurance and Liability

askKira maintains insurance cover to protect clients:

- Public Liability: £2,000,000
- Professional Indemnity & Products Liability: £2,000,000
- Employers' Liability: £10,000,000

15. Contact

Data Protection Lead Contact: [Name of staff member]

Name: [School/MAT DPO]

Email: [DPO Contact Email]

Phone: [Optional]

16. Version Control

- DPIA Version: v1.1 (Autumn 2025)
- Date Completed: [Insert Date]
- Next Review Due: [Insert Date]
- Reviewed by: [Name/Role]