



Data Protection Impact Assessment

Marvellous Me

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Juniper

Contents

Data Protection Impact Assessment (DPIA)	3
How to complete a DPIA.....	3
Screening	3
Full DPIA Assessment	3
Part 1	3
DPIA Screening.....	3
Part 2.....	5
About the Processing	5
Impact.....	9
Likelihood	9
Decision, Approval and Documentation	11
Appendix A.....	12
Guidance Notes.....	12
Appendix B.....	14
Risk Examples.....	14

Data Protection Impact Assessment (DPIA)

How to complete a DPIA

A DPIA must be carried out if new technology is being deployed or there is a change to the nature, scope, context or purposes of existing processing activities which meets any of the criteria below.

There are guidance notes in Appendix A to assist you in completing the form.

Screening

The DPIA comes in two parts: the first part is a short screening questionnaire, which requires you to answer a set of questions to establish whether certain data processing operations, activities or processes will impact upon the rights and freedoms of data subjects.

Full DPIA Assessment

Where you have answered yes to one or more of the screening questions in Part 1, you must complete Part 2 to document the assessment of the impact of the processing activities.

Part 1

DPIA Screening

Describe the project/processing/system etc. and, if it is new or a variation to existing, explain why it is being introduced. Include the objectives of the processing.

MarvellousMe is a web and app-based solution that allows teachers to share and celebrate news with parents about their child/children's learning journey. The result is better parental engagement, more home conversations about school, easier topic practice and greater at-home support, ultimately delivering improved happiness, motivation and outcomes for children.

MarvellousMe is easy for teachers to use, free for parents to join up to, and provides the school leaders with the visibility, control and management tools to ensure that parent engagement is effective and consistent in every class.

DPIA Screening Questions

Complete this section to help determine whether the processing is likely to result in a risk to the rights and freedoms of data subjects. Use the guidance in Appendix A to assist you. Where the answer is yes/true, indicate this in the relevant checkbox.

You should **consider** carrying out a DPIA if you plan to carry out any of the following:

- A major project involving the use of personal data;
- Deploy new software/application/technology;
- Evaluation or scoring;
- Systematic monitoring;
- Processing sensitive data or data of a highly personal nature;
- Large scale processing activities;

You **must always** carry out a DPIA if you plan to:

- Process special-category data or criminal-offence data on a large scale;
- Process personal data that could result in a risk of physical harm in the event of a security breach;
- Process personal data concerning vulnerable data subjects;
- Process children's personal data for profiling or automated decision-making or for marketing purposes, or to offer online services directly to them;
- Process biometric or genetic data;
- Systematically monitor a publicly accessible place on a large scale;
- Process personal data without providing a privacy notice directly to those affected;
- Process personal data in a way that involves tracking individuals' online or offline location or behaviour;
- Use systematic and extensive profiling or automated decision-making or special category data to make significant decisions about people including decisions on someone's access to a service, opportunity or benefit;
- Combine, compare or match data from multiple sources;
- Use innovative technology or technology in innovate ways;
- Processing that involves preventing data subjects from exercising a right or using a service or contract.

If **any** of the boxes above are ticked, a DPIA **must** be carried out. Complete and sign below then complete Part 2 of this form.

If none of the boxes above are ticked a DPIA is not required. Complete and sign below then forward this form to the DPO@junipereducation.org

Part 2

About the Processing

What data is being processed?

Tick all that apply

- Name
- Email, phone or other contact info.
- Other identifiers e.g. ID, username, etc.
- Financial information
- Religious Beliefs, Trades Union Membership or Political Opinions
- Medical/Health information or information about disabilities
- Criminal offences/convictions
- Information about behaviour
- Audio or video recordings (e.g. CCTV images) or photographs
- Location data
- Biometric or genetic information
- Profiling
- Other (please state below):

Who is the data about?

Tick all that apply

- Employees, former employees, or prospective employees incl. volunteers etc.
- Customers, former customers, or prospective customers
- Suppliers, former suppliers or prospective suppliers
- Members of the public

Describe the people whose data is being processed below. Include a description of the nature of the organisation's relationship with data subjects and whether the processing might include children or other vulnerable groups.

The categories of data subjects are teachers and school employees, parents, guardians and pupils. Juniper provides MarvellousMe to customers (Schools/MATs) whose staff/teachers then use it to communicate with parents/guardians about pupils/students.

Would the people whose data is being processed expect their personal data to be used in the ways envisaged? Include a justification if it is within their reasonable expectations.

Yes, it is a contracted service purchased by the School/MAT.

Purpose of the processing

What are the aims of the processing? What does the organisation want to achieve from it? If the data is pre-existing, how will the new use/processing differ from the current use/processing?

To provide contracted software/services to customers and enable them to communicate with parents of pupils/students within their school/MAT.

Responsibility/Beneficiaries

Who in our organisation is taking responsibility for the processing? Who stands to benefit from the processing and how? What are the intended effects on individuals? How will they benefit?

The MarvellousMe Product Manager has responsibility for the processing. Juniper benefits commercially and in relation to product development. However the main beneficiaries are the users who send and receive updates via the app.

Nature and context of the processing

Describe the processing activities and their purpose. Provide sufficient context to enable the reader to understand how and why the processing occurs. Include information about how data will be collected, used and stored; the scale size and frequency of processing as well as who will use the information and for what purpose(s). If the processing is novel in any way, please describe how.

MarvellousMe collects and stores personal data from registered clients and users of the MarvellousMe website and apps to enable schools to inform parents and guardians on their children's progress and achievements, and to monitor communications sent home from school staff.

To provide the core service, MarvellousMe collects and processes the minimal data necessary.

The categories of data subjects are teachers and school employees, parents, guardians and pupils.

From the school:

- Pupil first and last name
- Pupil UPN (Unique Pupil number) (This is the unique identifier for each child)
- Pupil School Registration Group
- Teacher/School Staff name
- Teacher/School Staff email
- Teacher/School Staff class(es) /group(s)

We do not collect date of births, addresses, ethnicity, gender or ethnicity.

From parents/guardians:

- Parent/Guardian name (Provided by the parent when they join up)
- Parent/Guardian email (Provided by the parent when they join up)
- Parent/Guardian phone/device ID (Provided by the parent when they join up)

IT Systems

What IT systems including hardware and software will be used for the processing? Include data flows where possible that explain and visualise the processing activities and flow of data.

MarvellousMe's sub-processor is CloudThing Limited, who provide the technical development and technical service to MarvellousMe.

Disclosure and Sharing

Will the data be shared with any other people/organisations such as government agencies, data processors or sub-processors e.g. third party suppliers, application/website hosting companies, etc? Yes No

If yes, please list them below and include the purposes of the processing, their country and a link to their privacy notice.

Name	Purpose of processing	Country	Privacy Notice Link
CloudThing		UK	Website Privacy Policy: Protecting Your Information Online Kerv

Consultation Process

The purpose of a consultation process is to understand the concerns and expectations of the individuals, test appropriate solutions and improve transparency.

Will the organisation be seeking the views of staff/customers/residents/other stakeholders regarding this processing? If not, why is this not necessary? If yes, describe the consultation process.

Product development – internal and external discovery and validation

Who else within the organisation will be consulted to ensure that all risks from the envisaged data processing are understood and properly mitigated?

Senior leadership team
Engineering team
Infrastructure
Support

Assessing the processing’s necessity and proportionality

Are there alternative solutions which meet the goals without creating the same data processing risks? For example, a high-risk data processing activity which carries minimal benefit for individuals or significantly affects their data protection rights may not be proportionate. Further, if there is a feasible alternative which is of lower risk (e.g. one that makes less use of personal data), such activity may also not be necessary.

Yes No

If there are no alternative solutions, consider whether the data processing complies with the data protection principles.

Rights

Where Juniper is the Data Controller, they are responsible for all data subjects’ rights request. Where Juniper is processing customer data e.g. to provide software or services, they are the Data Processor.

Who is responsible for responding to data subjects’ rights requests?

If the data subject is the Juniper customer, Juniper is the Controller. If the subject is a parent/guardian, pupil/student, teacher/member of staff then the Controller is the relevant Juniper customer (school/MAT).

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Privacy Information

Does the [Juniper Privacy notice](#) provide sufficient information about how the data will be obtained and processed? If not, please contact DPO@junipereducation.org to have it added.

Yes No

Lawful Basis

What is the lawful basis for processing the data? Tick all that apply

<input checked="" type="checkbox"/> Consent	<input type="checkbox"/> Vital interests	<input type="checkbox"/> Task by a public authority
<input checked="" type="checkbox"/> Performance of a contract	<input type="checkbox"/> Legal obligation	<input type="checkbox"/> Legitimate Interests

Is special category data processed? Special category data reveals racial or ethnic origin; political opinions; religious or philosophical beliefs; trade union membership; genetic data; biometric data (where used for identification purposes); health; sex life; and sexual orientation.

Yes No

If yes, what is the lawful basis for processing the special category data?

<input type="checkbox"/> Explicit consent	<input type="checkbox"/> Social security/protection law	<input type="checkbox"/> Legal defence or claim
<input type="checkbox"/> Employment law	<input type="checkbox"/> Vital interests	<input type="checkbox"/> Substantial public interest
<input type="checkbox"/> Public health interests	<input type="checkbox"/> Preventative/occupational medicine	<input type="checkbox"/> Archiving in public interest
<input type="checkbox"/> Data manifestly made public by data subject	<input type="checkbox"/> Scientific/historical research or statistical purposes	

Purpose Limitation and Minimisation

What measures have been taken to ensure that any personal data collected or created in this processing is not used for any purpose other than that documented in this DPIA?

The MarvellousMe platform has specific fields that the schools need to load their data to. No other type of data can be entered into the system.

What measures have been taken to ensure that only adequate and relevant information is used in the processing and that it is limited to only that which is necessary to achieve the processing aims?

MarvellousMe can only store data needed to perform the actions against a staff, pupil or parent.

Accuracy

What measures have been taken to ensure that personal data is accurate? Is there a requirement to keep any personal data up-to-date? Could there be any negative consequences if the personal data is not kept up-to-date?

Schools are required to upload data from their MIS to MarvellousMe.

Storage Limitation (Retention)

What is the retention period for the various types of personal data? If you cannot specify a specific retention period, what are the criteria that determine if the information is no longer needed, e.g. fulfilment of contract? How will the information be treated, e.g. returned/destroyed when it reaches the end of its retention period?

The data will be processed for the duration of the Terms agreed and then returned to the Data Controller and/or destroyed, or anonymised or pseudonymised.

Security

Describe the security measures that will be implemented to ensure the confidentiality, integrity, availability and restorability of the data, data systems and processes?

Our platform is operated across multiple, Tier 4 data centres which means that all components are fully fault- tolerant, including (but not limited to) internet uplinks, storage, cooling, power and servers.

Our data centre partner holds over 15 compliance certifications and has been approved for use on over 20 governmental frameworks. Our primary data-centre also features direct connectivity with JANET, the UK's Research and Education Network, for the best possible experience from connected education establishments. Access to this environment is tightly controlled and limited to a small number of Sec-DevOps engineers and senior developers based in the UK.

- We act as the Data Processor, acting only according to the instructions of the Data Controller (the school).
- We prohibit personal data or metadata being shared across other services, and only share data with our sub- processor (our technology partner). We do not share data with any other third parties.
- Access to the service is via a unique login ID and password. All aspects of the service, including authentication, are delivered via HTTPS.
- All data is encrypted.
- All transit of data is via secure, encrypted methods and at no time is data transferred between data centres without encryption. Our email traffic uses SMTPS to secure traffic using TLS.
- We strictly limit the amount of personal data stored and ensure that it is only retained for the minimum duration necessary.
- We destroy all the copies of a school's data within 90 days of the end of a contract, or upon request during the contract.
- Our service is backed up as a minimum every 24 hours. This ensures that all user data can be restored if required.
- The data is hosted with AWS in Ireland.
- We do not serve advertisements or carry-out any advertisement-related data mining.

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- We do not use or pass on any personal data or meta data for any commercial purpose.

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Client: Name Here

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