

# Data Protection Impact Assessment



Juniper Communications Hub

Date: 25/11/2025



Juniper

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# 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.

**Juniper Communications Hub is cloud-based parental engagement system, designed for school and MATs, our communications hub transforms school communications by providing a unified user interface for all communication methods and automates delivery based on parent contact data, contributing to optimised message delivery whilst keeping costs low.**

**Unlike other school communication platforms, our system will transforms school communication into strategic, omni-channel communications and enhanced parental engagement.**

**It is a new product, that Juniper will use to accompany our new MIS as well as other products in the Juniper eco-system.**

## 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:

- This a major project involving the use of personal data;
- 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](mailto:DPO@junipereducation.org)

Date of DPIA Screening	25/11/2024
Result of DPIA Screening	<b>Full DPIA required</b> / <del>Full DPIA not required*</del>

\*Delete one option

## Part 2

### About the Processing

#### What data is being processed?

Tick all that apply

- Name
- 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.

**Juniper Communications hub holds information who has any relation to a school or MAT, this includes subjects professionally linked with the school. The processing will definitely include pupils, parents and staff data.**

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.

**The subjects would expect this, it is common.**

#### 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?

**The processing allows users to effectively sent content or communications to recipient to keep them informed about their child and wider school news.**

## 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?

**Juniper will benefit commercially and in relation to product development through feedback. The user will benefit from the processing as it will allow them to engage and communicate parents.**

**Increasing parental engagement improves outcomes for children.**

## 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.

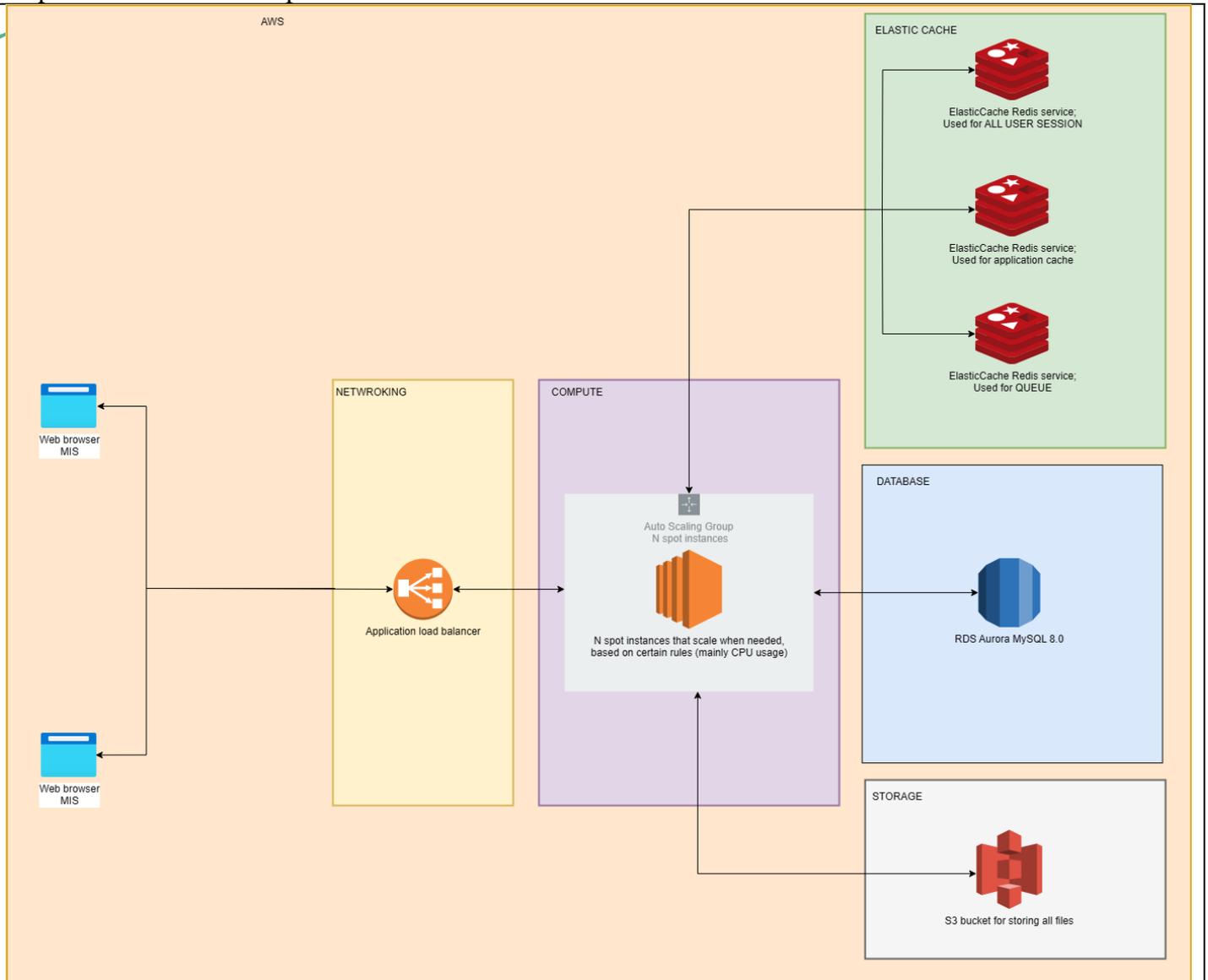
**Subjects will have their data collected and organised into relevant data storage. This will encompass everything that allows the user to work with the subject, such as identity and contact details. The data will come directly from our MIS or via Wonde.**

**Data is stored in secure cloud storage services. Processing occurs on a real time or scheduled basis. Data that is processed will then be available in the system to view so that users can make any interventions required.**

## 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.

**Juniper Communications Hub is based on the AWS cloud computing stack. The structures and related products are outlined below.**



**Comms hub**

The Comms hub is hosted within AWS and can be split into the following structures:

**Networking - Amazon Elastic Load Balancing**

**Compute - Amazon EC2 Spot Instances**

**Cache - ElastiCache Redis**

**Database - RDS Aurora**

**Storage - S3**

**ETL Tooling**

The ETL tooling is hosted within AWS. It takes data from an input source and outputs it to Juniper MIS. This process uses the following systems:

**Database - MySQL**

**Web Server - Apache**

**Files - S3 / NFS**

## 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
DfE	Statutory	UK	<a href="#">Link</a>
Wonde	Data Share, Statutory	UK	<a href="#">Link</a>
AWS	Hosting	UK	<a href="#">Link</a>
Apache	Hosting	UK	<a href="#">Link</a>
Twilio	Sending SMS	USA	<a href="#">Link</a>
AWS Email service	Sending Emails	UK	<a href="#">Link</a>

## 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.

**No, the organisation have a similar product with customers and they expect this level of processing.**

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

**All technical and operational colleagues will be consulted.**

## 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?

**Juniper customers act as the controller and they are responsible for subject access requests.**



## 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](mailto: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 checked="" type="checkbox"/> Vital interests	<input checked="" 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 data is only shared with the organisation or 3<sup>rd</sup> parties on their behalf, any related technical products have agreements in place to ensure GDPR requirements are met.**

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?

**There is a limited data set that can be processed and this is all viewable in the product.**

## 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?

**Data in comms hub will always from our MIS, another MIS or via manual upload via the Juniper Portal. Those products will always be the single point of truth.**

## 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?

**Data is retained for the contract length. On termination of the contract, data is destroyed after 30 days.**

## Security

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

**We take the security of data very seriously. A range of internal measures ensure the integrity of our systems, these include:**

- **Use of an external security provider to check for vulnerabilities in our network on a frequent basis**
- **Continuous staff security training**
- **Robust firewall with automatic alerts**
- **Quick response times**

# Juniper



*WE LOOK AFTER YOU, SO THAT YOU  
CAN LOOK AFTER OUR CHILDREN*

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