Data Protection Impact Assessment

Sisra Observe

Date: 05/02/2025

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.

Observe is a web-based, user-friendly system which helps to centralise all aspects of professional development documents and recording. Observe simplifies the quality assurance, self-evaluation and appraisal process, allowing users to record, store and analyse teaching and learning data and use this to identify areas of strength and development needs and plan appropriate CPD. Designed for Primary, Secondary and All-through schools; Observe provides an up-to-date teaching and learning picture, benefiting all staff members.

We process personal staff performance and HR related information including appraisal documentation and not limited to medical reasoning.

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

Date of DPIA Screening	05/02/2025
Result of DPIA Screening	Full DPIA required

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.

Staff within the organisation (School/College/Training Provider) regular quality assurance records including: Observations, Learning Walks, Book Scrutiny etc. Some customers also have information relating to CPD and Appraisal records within the system which may include Back to Work forms, Occupational Health information and other information relating to Performance Management and pay progression

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.

Reasonable expectations would be that a record would be able to be viewed by those with pre-set permissions within the system (HoD, SLT, Head Teacher etc) but not those who do not need access i.e. peers etc.

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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?

Schools need to have a record of teacher assessment and appraisal – by using the system they can centralise these records and put everything online rather than having multiple spreadsheets or paper forms. The system also allows for charts and graphs to be generated and results to be filtered to allow for leaders to easily review outcomes and assess where areas of strength and development needs are within the establishment.

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 responsibility for the processing of data primarily lies with the schools and educational institutions that use the software. These institutions act as the data controllers, determining the purposes and means of processing personal data related to teacher assessments and appraisals.

Our organisation, as the provider of SISRA Observe, functions as a data processor. We process the data on behalf of the schools, in accordance with their instructions and in compliance with applicable data protection laws, such as the General Data Protection Regulation (GDPR). Our Data Protection Officer (DPO) ensures that we uphold stringent data protection standards and that the system is designed to support schools in meeting their compliance obligations.

Beneficiaries:

1. Schools and Educational Institutions:
    - How They Benefit: Schools benefit from centralising teacher assessment and appraisal records within a secure, online system, reducing reliance on disparate spreadsheets or paper forms. This centralisation improves data management, security, and accessibility. Schools can also leverage the system's analytical tools to gain insights into performance trends and areas for development.
2. School Leaders and Administrators:
    - How They Benefit: School leaders and administrators can efficiently monitor and assess teacher performance, using the system to generate reports, charts, and graphs. This facilitates data-driven decision-making, helping them identify strengths and areas needing improvement, which can lead to better educational outcomes.
3. Teachers:
    - How They Benefit: Teachers benefit from clear, consistent, and objective feedback on their performance, based on centralised data. The system helps in tracking their progress over time, supporting their professional development and potentially enhancing job satisfaction through a transparent appraisal process.

Intended Effects on Individuals:

- For Teachers: The system aims to support a more transparent and structured appraisal process, leading to professional growth. By providing objective and data-driven feedback, it helps teachers understand their strengths and areas for development, fostering continuous improvement.
- For Students: Although students' data isn't directly processed by the system, the improved quality of teaching resulting from enhanced teacher appraisals can positively impact their learning experiences and outcomes.
- For the Organisation: By offering a compliant and efficient system for managing teacher appraisals, our organisation helps schools to meet their data protection responsibilities while improving their operational effectiveness.

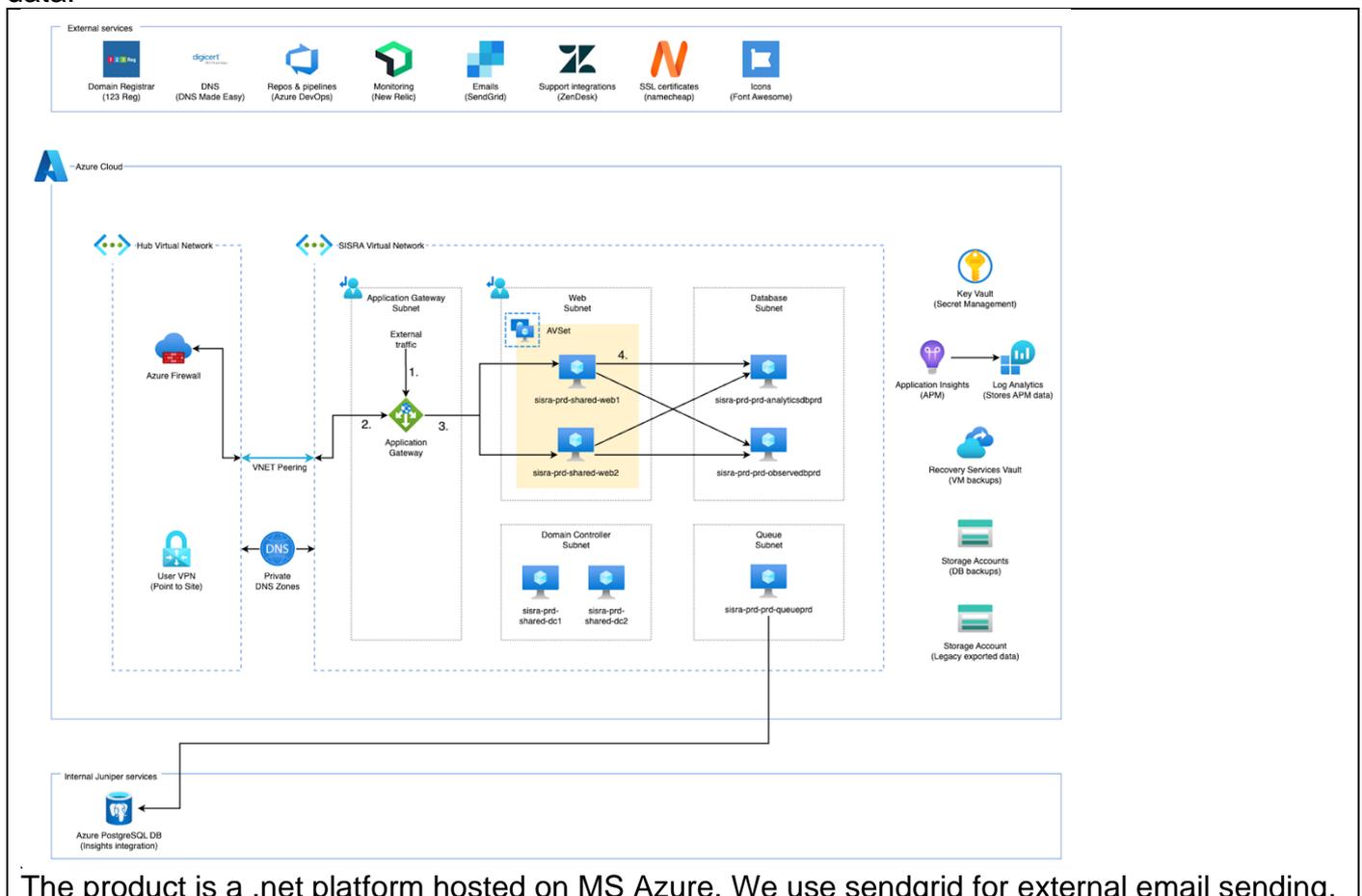WE LOOK AFTER YOU, SO THAT YOU CAN LOOK AFTER OUR CHILDREN

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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.

- Typically, schools will import staff information into the system at the beginning of a new academic year. The basic information requested by the system is: Name; Staff ID (School defined); Team/subject they are linked to. Schools can also choose to include their own filters which they can import into the system such as, Role, Payscale etc. The information would need to be exported from the establishment's MIS and imported into the system via a .CSV file.
- User information also includes staff email addresses – their username and password is then sent in an automated email directly to the user.
- Schools can also include contextual information relating to classes. The basic information requested by the system includes: Subject/Team, Class name and Year group. Schools can choose to include other contextual information such as number of students in the class; number of PP/SEND/EFL students etc.

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.

The product is a .net platform hosted on MS Azure. We use sendgrid for external email sending,

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
Sendgrid	Email sending	US	https://sendgrid.com/en-us/policies/security / Complies to Data Privacy Framework
MS Azure	Hosting	UK	Protecting privacy in Microsoft Azure: GDPR, Azure Policy Updates | Microsoft Azure Blog

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.

We consult staff/customer/other stakeholders when considering processing and system development.

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, DPO, Product.

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?

The relevant Juniper customer is the Data Controller and responsible for subjects' rights 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 to have it added.
☒Yes   ☐No

Lawful Basis

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

☐ Consent	☐ Vital interests	☐ Task by a public authority
☒ Performance of a contract	☒ Legal obligation	☒ 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?

☐ Explicit consent	☐ Social security/protection law	☐ Legal defence or claim
☐ Employment law	☐ Vital interests	☐ Substantial public interest
☐ Public health interests	☐ Preventative/occupational medicine	☐ Archiving in public interest
☐ Data manifestly made public by data subject	☐ 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?

Juniper only processes the minimum data required to fulfil the contract. Juniper customers are responsible for deciding what data will be added to 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?

Automated scripting to remove data, limited types of data collected,

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?

It is the customers responsibility to keep their information within the product up-to-date such as their email address and passwords.

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?

- Once a school has cancelled, we delete their information from the database 30 days after the cancellation date.
- We only retain personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.
  To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.
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Security

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

Encryption, secure hosting, penetration testing, cryptography, automated disaster recovery and business continuity plans.

Risk Assessment

In identifying risks consider the potential impact on individuals Also consider how risks could be mitigated, reduced or eliminated all together. See examples in Appendix B.

To assess the level of risk, you should consider both the likelihood and severity of the possible harm that may be caused as a result of the processing activities. In determining the overall risk, use the matrix below:
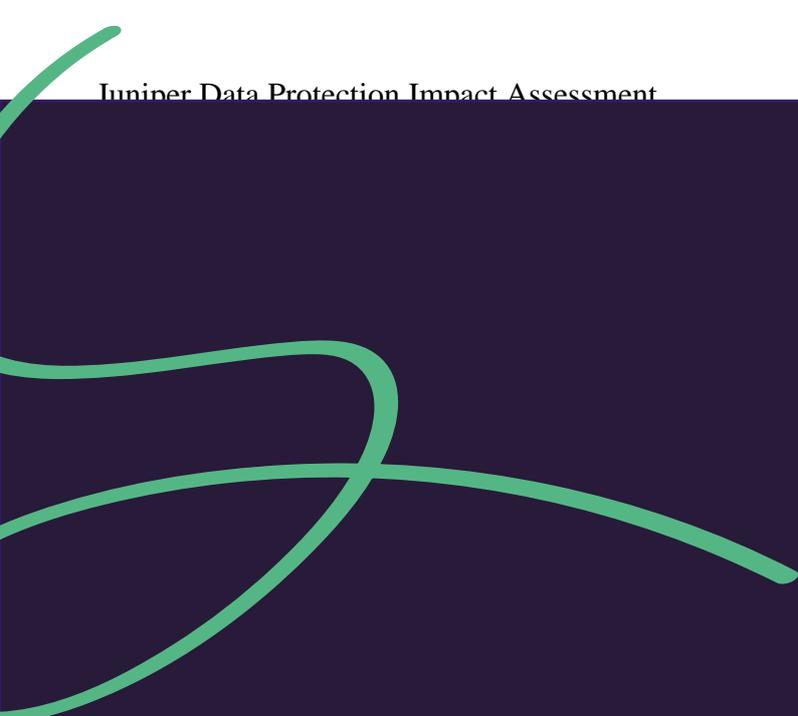
Impact	Likelihood				
	Unexpected (1) Safe Zone	Unlikely (2)	Possible (3)	Likely (5)	Certain/Occurring now (7) Danger Zone
Severe (15) Danger Zone	Med Low 15	Med 30	Med High 45	High 75	High 105
Major (10)	Med Low 10	Med Low 20	Med Low 30	Med High 50	High 70
Significant (6)	Low 6	Med Low 12	Med Low 18	Med 30	Med High 42
Important (3)	Low 3	Low 6	Low 9	Med Low 15	Med 21
Minor (1) Safe Zone	Low 1	Low 2	Low 3	Low 5	Low 7

Risks

In the table below, describe the risk, its source and the nature of potential impact on individuals. Identify as many risks as possible. Against each risk identified, determine the likelihood of the risk arising and the severity of harm caused if it did arise. Then document options for mitigating each risk, describe the effect on the risk and rescore it putting your evaluation of the mitigated risk score in the Residual risk score box.

Describe the risk, its source and the nature of potential impact on individuals	Likelihood of harm	Impact/Severity of harm	Overall risk score	Options to mitigate or eliminate risk.	Effect of mitigations on risk	Residual risk score
Inability to access services – if user loses login credentials	Possible	Minor	3	Users can reset their passwords if forgotten	Eliminated	Low
User's credentials are compromised	Possible	Important	9	Users are encouraged not to share their credentials	Accepted	Low
Data leak or security incident could expose data	Unlikely	Important	6	Appropriate technical and organisation security measures in place. No special category data.	Accepted	Low

add more rows as required to log all relevant risks.

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